



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

June 23, 1982

HAND DELIVERED

John P. Leo, Engineer
c/o Picillo Site
Coventry, Rhode Island

Re: Picillo Property
Coventry, Rhode Island

Leo DEPOSITION
Def Exh. 8 FOR IDENT.
CLAUDIA RATHBUN
NOTARY PUBLIC, R. I.

Dear Mr. Leo:

This is to confirm a site visit, to the above-captioned property, by R. S. Hendey of Olin Corporation and the undersigned, at your invitation, for the purpose of facilitating the identification of any material generated by the Olin Corporation or disposed of by Olin, found at the above-captioned site. For the record, and as we discussed during our visit, Olin's internal, waste disposal records do not reflect any chemicals, waste materials or any other compounds being shipped to the above-captioned location. Our records, however, do indicate two shipments of materials to the Capuano Brothers landfill in Cranston, Rhode Island.

Both of the shipments to Rhode Island were made through Chemical Waste Removal, Inc., Bridgeport, Connecticut. The first shipment occurred on or about August 31, 1977 and the second shipment was made, also through Chemical Waste Removal, on September 29, 1977. Our records do not specifically identify the materials sent to Cranston; however, the waste do fall into three general categories:

1. HTH® samples (calcium hypochlorite)
2. Isocyanates
3. Polyols

During the course of our site visit to the Picillo property, we inspected two 55 gallon drums which you believed may have originated at the Olin Corporation. You also noted two other containers either sent to or from Olin in New Haven, Connecticut. These two containers

My Direct Dial Number:

203-789-5330

O L I N C O R P O R A T I O N



SEMS DocID

642490

consisted of a 5 gallon pail with the designation Emery 9877-U fatty acid and a smaller container apparently delivered by the Humphrey Chemical Company, North Haven, Connecticut to Olin in New Haven.

I have been able to develop some additional information for you in connection with the foregoing and I am also providing you herewith product data sheets and bulletins, material safety data sheets and other identified data and information concerning the three compounds described above as well as other chemicals for which you requested physical property data.

First, in connection with the material apparently mailed to Olin from the Humphrey Chemical Company, I have spoken with our Sam Trotz, Ph.D., and he advises me that it is likely that the material sent by Humphrey, in the four small ampules, is 2,4-difluoronitrobenzene. This compound is an intermediate in the manufacture of difluoroaniline, itself an intermediate in the manufacture of an oral drug preparation manufactured and distributed by Merck Company. For your information, I am herewith enclosing Olin's Material Safety Data Sheet for 2,4-difluoronitrobenzene.

Secondly, we have yet to identify the waxy, viscous light brown material found in the 5 gallon pail. However, I will still continue to interview appropriate personnel in New Haven to attempt to ascertain the nature of this material. If I am able to develop some more definitive information on the identity of this substance, I will contact you immediately.

Thirdly, in connection with the isocyanate material which may be present on-site, I am herewith providing you with the following information:

- (a) Technical data and information furnished us by the Upjohn Polymer Chemicals Company concerning the polymeric isocyanurate compounds we purchase from them. This information and materials include two technical bulletins and a material safety data sheet.
- (b) Olin's material safety data sheet, product data bulletin and product storage and handling bulletin for our isocyanate family of chemicals.
- (c) A general Olin bulletin on toluene diisocyanate (750-008).

Fourth, I am enclosing herewith some general data and information concerning our polyol compounds manufactured by Olin. This information will provide you with the relevant physical properties for all our polyol products:

John P. Leo
Page 3
June 23, 1982

10910007

- (a) material safety data sheet and application data bulletin for Poly-G® 32-56
- (b) material safety data sheet and application data bulletin for Poly-G® 71-530
- (c) material safety data sheet and product data bulletin for Thermolin® RF-230

Fifth, I am also herewith enclosing for your information and use Olin's material safety data sheet for calcium hypochlorite. Inter alia, this information includes a description of the physical properties of calcium hypochlorite.

As we discussed, I found it very difficult to precisely identify the nature of the material in any of the drums or containers you believe have come from Olin. We also discussed the fact that Olin's records, in addition to not reflecting any shipments to the Picillo Property, only indicate, in a general way, the nature of the materials (see description above) sent to the Capuano Brothers' landfill in Cranston, Rhode Island. With this as background, I suspect you can appreciate the difficulty we are having in identifying the substances involved with any degree of precision. Nonetheless, we are herewith providing you with data and information, concerning the physical properties, of the two main chemical categories or families described above, viz; the isocyanates and polyols.

I am also compelled to point out that in addition to any of the materials found at the Picillo property not being sent directly to this site, we, as you might expect, have no way of knowing whether any of the materials originally sent to Cranston, by Olin, are, in fact, still in the original container(s), or whether other compounds have been substituted for or reacted with these materials. I am sure you have dealt with this potential problem in the past but I think it is sufficiently important to raise it with you as it may apply to the containers inspected by us.

I hope the foregoing has been helpful and the enclosures in some way facilitate your final disposal of the above waste materials. We will continue, at this end, to seek to generate any additional information which may be of assistance to you. However, I trust you will feel free to contact me in New Haven or R. S. Hendey in Stamford in connection with anything we discussed during our site visit on Tuesday, June 22, or any other related matter.

John P. Leo
Page 4
June 23, 1982

10910008

Mr. Hendey and I again want to thank you and your associates, especially Mr. Brodd, for all the help and information you provided us during our visit and again, we trust you will feel free to call upon us in the future if we can be of any additional assistance to you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allyn Myles Carnam". The signature is written in dark ink and is positioned above the printed name.

Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosures

Memo To File

Date 23 June 82

From John Leo

Subject Meeting with
Representatives of Olin Corporation

On June 22 1982 MR. Richard
S Hendey Jr and Mr Allyn Mages
Carran, representing Olin Corporation
met with Mr John Leo representing
RI DEM.

During their visit to the site
Mr Hendey and Mr Carran
were shown the various drums
belonging to the Olin Corporation.

They said that the barrel which
was shown them are their barrels
and that based on the labels of those
barrels the material came from their
research center in New Haven and
the facility in Stamford Conn.

Mr Hendey said that he had
checked the records the company
had of the disposal of waste as
the past and had found that
Olin had disposed of waste
with Atlas Inc. in 1975 and
that the company was a similar

switched over to Chemical
Waste Removal of Bridgeport
who had taken their waste to
Capramo landfill in Cranston.
Based on the material shown
them it was their belief that
this material was the material
they had invoices for as being
disposed at Capramo's in
1977.

The material disposed of was
flammable waste made up
of

- ① Isocyanate Resin
I.e. "TDI"

② Polyether Diol.

Also they said that the lab
pack material in the 5 gallon
can appear to be a fatty acid
but could not say how it was
to be used or what the hazards
are.

As for the other material they said
they would check it out and get
back to me, ~~too~~

I explained we were trying to
get rid of the material as soon
as possible and would appreciate

Olin Corporation
275 South Winchester Ave
New Haven Conn.

Tel 203-789-6000

also

120 Long Ridge Rd
Stamford, Conn.

June 7, 1982

Talked to

DR Kauss who told me to talk to
PA Barbice 203-789 5435 he is
a Toxicologist who had the
contact

MR Dick Hendey at Stamford Conn
203-356-3037

I spoke with him and he said
he would be willing to help and
will be coming out to the site to
see the barrels.

with the main office but they
felt they had not improperly
disposed of the material knowingly.

I thanked them for their assistance
and ask for any other information
they may have concerning this
matter.

10910013

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(EPA)



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

July 27, 1982

Joel Blumstein, Esquire
U. S. Environmental Protection Agency
Region I
J. F. Kennedy Federal Building
Boston, MA 02203

Re: Picillo Waste Disposal Site - Coventry,
Rhode Island; Request for Information

Dear Mr. Blumstein:

This confirms my attempt to reach you at your office on Tuesday, July 27, 1982, in response to Mr. Sutton's July 22 letter to Theodore Heying, Ph.D., of the Olin Corporation of New Haven, Connecticut, regarding the above-captioned matter. Your office advised me that you were on vacation for the balance of this week and since I will be on vacation until August 9, I do want an opportunity to discuss Mr. Sutton's letter with you before Olin submits a formal response.

As you may know, Olin has submitted data and information, similar to what you requested, to the State of Rhode Island through Mr. John P. Leo of the State Department of Environmental Management. A copy of this letter is enclosed herewith for your information and review. I also will plan to call you when I return from my vacation on August 9 to discuss Olin's formal response to EPA's July 22 letter.

Sincerely,


Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosure

cc: Daniel J. Schatz, Esquire
Special Assistant Attorney General

My Direct Dial Number:
203-789-5330

O L I N C O R P O R A T I O N

OCG 007
10910014 (EPA)



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

August 13, 1982

RECEIVED

Joel Blumstein, Esquire
U. S. Environmental Protection Agency
Region I
J. F. Kennedy Federal Building
Boston, MA 02203

AUG 19 1982

REGION I
OFFICE OF REGIONAL COUNSEL

Re: Picillo Waste Disposal Site - Coventry,
Rhode Island; Request for Information

Dear Mr. Blumstein:

This follows our telephone conversation on Tuesday, August 10, in which we discussed Olin's compliance with EPA's Request for Information in connection with the above-captioned matter.

As you and I agreed, I am herewith providing you with the shipping documents, invoices, service orders and other similar information in connection with Olin's shipment of chemical wastes to the Capuano Brothers landfill in Cranston, Rhode Island. Olin made two shipments of chemical wastes to the State of Rhode Island and these were to the Capuano landfill in August and September, 1977.

The above shipments were made through Chemical Waste Removal, Inc., of Bridgeport, Connecticut. As noted above, Olin intended that the chemical wastes, encompassed by the attached documents, to be disposed of at the Capuano landfill in Cranston, Rhode Island. We first became aware of the apparent disposal at the Picillo site when Olin received a telephone call from Mr. John Leo of the Rhode Island Department of Environmental Management.

For your convenience, I have attached two appendices in which I have included the above documents. Appendix A includes a service order, purchase invoice approval, Chemical Waste Removal, Inc. invoice and a shipping order to Capuano Brothers regarding the August shipment of chemical waste; Appendix B contains similar documentation in connection with our shipment of waste materials in September, 1977, to the Capuano landfill.

My Direct Dial Number:

203-789-5330

O L I N C O R P O R A T I O N

Joel Blumstein, Esquire
Page 2
August 13, 1982

In reviewing our purchase orders and related invoices, for the period January 1, 1974 to and including December 31, 1977, we did determine that chemical wastes were shipped to New Jersey for final disposal via two companies, S. W. S. Associates and Atlas, Inc.; both these companies were owned and operated by Mr. Earl Weigel of Bloomsberry, New Jersey. We have information to suggest that some of these wastes may have been disposed of at the Chemical Control Corporation site in Elizabeth, New Jersey; however, our best information is that all of these were incinerated by Chemical Control.

Additionally, we identified two purchase orders (Purchase Orders RC-43844 and RC-43863; see Appendix C) concerning the disposal of a quantity of swimming pool chemicals with Chemical Control Corporation.

Purchase Order RC-43844 relates to a shipment of HTH® (calcium hypochlorite), delivered to Atlas, Inc. for final disposal with Chemical Control. We, however, also have some information suggesting that this material was taken to Rickel Brothers in Bergenfield, New Jersey rather than Chemical Control. In any event, the material consisted of 19 cases of calcium hypochlorite, a swimming pool and water purification compound. Chemical Control also may have been used by Olin during 1978 for disposal of broken containers of and off specification calcium hypochlorite.

Purchase Order RC-43863 concerns the disposal of 3,000 lbs. of trichloro-s-triazinetriene, also an Olin swimming pool chemical, in September, 1978. The material was located at a warehouse in Patterson, New Jersey and our records only show that Chemical Control picked up this material for disposal but does not indicate where the final disposal took place.

Finally, I have verified the foregoing with Olin personnel responsible for chemical disposal and it is their best recollection that Olin made no other shipments, other than what is described above, to the State of Rhode Island or with the companies and/or individuals listed on page 2 of Mr. Sutton's July 22 letter to Dr. Heying. In short, the foregoing and enclosed materials represents all the transactions, involving chemical waste disposal, between Olin and waste disposal sites or landfills in the State of Rhode Island and/or with the companies disclosed to us in the above correspondence.

Joel Blumstein, Esquire
Page 3
August 13, 1982

10910016

Please feel free to call me at my New Haven office if you wish to discuss any of the foregoing or enclosures further.

Sincerely,

A handwritten signature in black ink, appearing to read "Allyn Myles Carnam". The signature is fluid and cursive, with a large loop at the end.

Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosures

cc: Daniel J. Schatz, Esquire
Special Assistant Attorney General

10910017

Appendix A

10910018

906-962-344-8462000 \$1440
 906-967-344-8467000 \$935
 906-966-344-8466000 \$550
 906-990-344-8490000 \$238.15

PURCHASING INVOICE APPROVAL

OM 217P

RC-3158

INSTRUCTIONS:

1. Complete this form for equipment, materials, or services for which a Purchase Order has not been issued.
2. May be used for purchases with a total value of \$500 or a total value of \$1,000. If such higher limit is permitted by operating unit approved written procedures.
3. Original and duplicate of invoice(s) must be attached.
4. Sign with full signature in ink in space provided.
5. Forward to appropriate Purchasing Department.

INVOICE RECEIVED FROM Chemical Waste Removal		INVOICE DATE 9-8-77	INVOICE NO. 1227	AMOUNT \$2,163.
CHARGE ACCOUNT NUMBER	DEPARTMENT Chemicals R+D	LOCATION New Haven		

PURCHASE
AND
RECEIPT

I certify that the materials or services covered by the attached invoice(s) were purchased by me in accordance with applicable standard procedures, and that the goods or services have been received.

SIGNATURE

D.A. Gili

DATE

9/12/77

APPROVAL

Must have requisitioning authority to cover amount of purchase.

SIGNATURE

C. F. Shue

DATE

9/13/77

FOR ACCOUNTING USE ONLY

ACCOUNTING CODE NUMBER	DEBIT AMOUNT	CREDIT AMOUNT

REVIEW BY PURCHASING

SIGNATURE

DATE

Phone 234-4355

Thank You

RESEARCH CENTER SERVICE ORDER

300 N. Winchester Avenue
New Haven, Connecticut 06504
Phone 777-7600 Area Code 203
Ext. 644

No. RC-3158

THIRD NC EDITION NO.

484-10

OWNER

TO

REQUISITION NO. **rf-2237**

DATE **8/31**

Chemical Waste Removal Inc.
P.O. Box 9055
Bridgeport, Ct. *Bridgeport*

OWNER'S ORDER NO. MUST APPEAR ON ALL PACKAGES,
SHIPPING DOCUMENTS, INVOICES AND CORRESPONDENCE.
QUANTITY, UNITS, AND OWNER'S CODE NO. MUST
APPEAR ON INVOICES AND PACKING LISTS.

MAIL INVOICES IN TRIPLICATE TO:

W.C. Ready 1K5

INVOICING

OLIN CORPORATION
275. SO. WINCHESTER AVE. BLDG. 1K5
NEW HAVEN, CONN. 06504

CONTRACTOR

☒ WINCHESTER-WESTERN DIVISION
☐ CORPORATION ☐ PARTNERSHIP ☐ INDIVIDUAL
NAME

SCHEDULE

OWNER'S CODE NO.

BEGIN

J/L NO.

COMPLETE

ACCOUNTING CHARGE NO.

8/31/77

Various

PLACE OF WORK **OLIN BRASS**

☐ METALLURGICAL LABORATORIES

TERMS AND CONDITIONS PRINTED ON THE REVERSE SIDE HEREOF AND ANY SUPPLEMENTAL
CONDITIONS ATTACHED HERETO ARE ESSENTIAL TERMS OF THIS ORDER

SCOPE OF WORK (See Section I Other Side)

DESCRIPTION

QUANTITY

UNIT

PRICE

AMOUNT

**55 GAL. DRUMS OF HTH SAMPLES
(OXIDIZER)**

Pick up and remove for disposal, the following chemicals:

- 16 ea. Drums of packed chemicals OF PAKED "F"
- 16 ea. Drums of Polyols
- 3 ea. Drums of Isocyanates
- 3 ea. Drums of packed HTH samples

Charge numbers: 905-962-344-8482-000 = \$440.00 906-966-344-8466-000 = \$550.00
906-967-344-8467-000 = \$935.00 906-990-244-8490-000 = \$165.00

ABOVE WORK TO BE DONE IN ACCORDANCE WITH THE DOCUMENTS IDENTIFIED BELOW WHICH ARE ATTACHED TO, AND CONSIDERED A PART OF, THIS ORDER. ANY
QUESTIONS CONCERNING THIS ORDER OR THE ATTACHED DOCUMENTS SHOULD BE BROUGHT TO THE ATTENTION OF THE BUYER BEFORE WORK IS STARTED.

THIS ORDER MUST BE ACKNOWLEDGED AND INSURANCE CERTIFICATE MUST

BE SENT TO THE ATTENTION OF W. C. READY 1-K-5.

REMOVE FOR DISPOSAL

D.A. Gillis

E. T. Shields

SEND INVOICE COPIES TO:

☐ GENERAL ACCOUNTING

AMOUNT

FIXED PRICE

PE * NOT TO EXCEED **\$2,090.00**

* The aggregate cost of performance of this order shall not exceed the amount as indicated above. Contractor shall not be entitled to reimbursement for cost above this amount
unless authorized in writing by owner. Time and material must be submitted daily to Project Engineer and all invoicing must be accordance with rates as established with owner
in your letter dated. Copy of which is on file in this office.

NAME OF
CONTRACTOR

BY **Chemical Waste Removal Inc.**

DATE

8/31/77

SEND INVOICE COPIES TO:

OLIN CORPORATION

BY

W.C. Ready

NOTE: If "BILL TO" is different than "SHIP TO" indicate in SPECIAL INSTRUCTIONS.

SHIP TO: CAPUANO BROS.
CRANSTON, RHODE ISLAND

SHIP VIA: CHEMICAL WASTE REMOVAL, INC.
TRUCK

SHIPPING CHARGES TO BE PAID BY

☐ OLIN MATHIESON

☒ RECIPIENT OF GOODS

ORIGINATED BY

- ☐ WINCHESTER-WESTERN DIVISION
☐ RAMSET
☐ OLIN BRASS
☐ METALLURGICAL LABORATORIES
☒ OLIN RESEARCH CENTER

CASES

CAR NO.

INVOICE DATE

CUSTOMER ORDER NO.

RC-3158

WEIGHT

B/L NO.

TERMS

DATE

8/31/77

QUANTITY	UNIT	DESCRIPTION	QUANTITY SHIPPED	UNIT PRICE	AMOUNT DUE
3	EA.	55 GAL. DRUMS OF HTH SAMPLES (OXIDIZER) 962	3		
5	EA.	55 GAL. DRUMS OF PACKED "F" 967	5		
8	EA.	55 GAL. DRUMS OF PACKED "D" 990	8		
2	EA.	55 GAL. DRUMS OF PACKED "C" 962	2		
1	EA.	55 GAL. DRUM OF PACKED "B"	1		
16	EA.	55 GAL. DRUMS OF POLYOLS 966	16		
3	EA.	55 GAL. DRUMS OF ISOCYANATES 966	3		

SEE ATTACHED LIST

REASON FOR SHIPMENT

MATERIALS ARE FOR DISPOSAL

38 DRUMS X \$55 = \$2090

SPECIAL INSTRUCTIONS

SEND INVOICE COPIES TO:

☐ COST ACCOUNTING

☐ PROPERTY SECTION

☐ PERSONS LISTED BELOW

D. A. GILLIS
SUPERVISOR, SAFETY
& LOSS PREVENTION

REQUESTED BY

APPROVED BY

DATE

8/31/77

SEND SHIPPING COPY AND PACKING LIST TO: (NAME AND LOCATION)

DECLARED VALUE

ACCOUNT CREDITED

10910021

Appendix B

SERVIC ORDER

New Haven, Connecticut 06504
Phone 777-7 (Area Code 203)
Ext. 644

No. RC-3181 ✓

10910022

OWNER

TO

REQUISITION NO. rf-2271

DATE 9/29/77

Chemical Waste Removal, Inc.
P. O. Box 9055
Bridgeport, CT 06601

OWNER'S ORDER NO. MUST APPEAR ON ALL PACKAGES, SHIPPING DOCUMENTS, INVOICES AND CORRESPONDENCE. QUANTITY, UNITS, AND OWNER'S CODE NO. MUST APPEAR ON INVOICES AND PACKING LISTS.

MAIL INVOICES IN TRIPLICATE TO:
W.C. Ready 1K5

INVOICING

OLIN CORPORATION
275. SO. WINCHESTER AVE. BLDG "K"
NEW HAVEN, CONN. 06504

906-966-344-8466000
CORPORATION ☒ PARTNERSHIP ☐ INDIVIDUAL ☐

PLACE OF WORK Tract C

SCHEDULE	OWNER'S CODE NO.
BEGIN	
COMPLETE	
9/28/77	See Below
	ACCOUNTING CHARGE NO.

TERMS AND CONDITIONS PRINTED ON THE REVERSE SIDE HEREOF AND ANY SUPPLEMENTAL CONDITIONS ATTACHED HERETO ARE ESSENTIAL TERMS OF THIS ORDER.

SCOPE OF WORK (See Section 1 Other Side)

INVOICES RECEIVED FROM
Pick up and remove for disposal, the following chemicals:

42 each, 55 gallon drums of "A" side polyols.
17 each, 55 gallon drums of "B" side isocyanates.
21 each, 55 gallon drums of packed chemicals

PURCHASE AND RECEIPT CHARGES

906-966-344-8466000	\$3,245.00
906-990-344-8490000	385.00
906-967-344-8467000	385.00
906-962-344-8462000	385.00
SIGNATURE	\$4,400.00

ACCOUNTING CODE NUMBER	DEBIT AMOUNT	CREDIT AMOUNT

ABOVE WORK TO BE DONE IN ACCORDANCE WITH THE DOCUMENTS IDENTIFIED BELOW WHICH ARE ATTACHED TO AND CONSIDERED A PART OF THIS ORDER. ANY QUESTIONS CONCERNING THIS ORDER OR THE ATTACHED DOCUMENTS SHOULD BE BROUGHT TO THE ATTENTION OF THE BUYER BEFORE WORK IS STARTED.

PLEASE ACKNOWLEDGE THIS ORDER TO THE ATTENTION OF W. C. READY.

INSURANCE CERTIFICATE IS ON FILE IN THE OFFICE OF W. C. READY.

D. A. Gillis

E. T. Shields

AMOUNT

FIXED PRICE
* NOT TO EXCEED \$4,400

The aggregate cost of performance of this order shall not exceed the amount as indicated above. Contractor shall not be entitled to reimbursement for cost above this amount unless authorized in writing by owner. Time and material must be submitted daily to Project Engineer and all invoicing must be accordance with rates as established with owner in your letter dated. Copy of which is on file in this office.

NAME OF CONTRACTOR
BY Chemical Waste Removal
DATE
BY W.C. Ready
OLIN CORPORATION

REQUISITIONER

NOTE: If "BILL TO" is different than "SHIP TO" indicate in SPECIAL INSTRUCTIONS.

SHIP TO: CAPUANO BROS. CRANSTON, RHODE ISLAND		SHIP VIA: CHEMICAL WASTE REMOVAL, BRIDGEPORT, TRUCK	
ORIGINATED BY: <input type="checkbox"/> WINCHESTER-WESTERN DIVISION <input type="checkbox"/> RAMSET <input type="checkbox"/> OLIN BRASS <input type="checkbox"/> METALLURGICAL LABORATORIES <input type="checkbox"/> OLIN RESEARCH CENTER		SHIPPING CHARGES TO BE PAID BY: <input type="checkbox"/> OLIN MATHIESON <input checked="" type="checkbox"/> RECIPIENT OF GOODS	
CASES		WEIGHT	
CAR NO.		B/L NO.	
INVOICE DATE		TERMS	
CUSTOMER ORDER NO.		DATE	

QUANTITY	UNIT	DESCRIPTION	QUANTITY SHIPPED	UNIT PRICE	AMOUNT DUE
42	EA.	OF "A" SIDE POLYOLS	42		
17	EA.	OF "B" SIDE ISOCYANATES	17		
21	EA.	OF PACKED CHEMICALS (VARIOUS UNKNOWN)	21		
RC-3181					

REASON FOR SHIPMENT

MATERIALS ARE FOR DISPOSAL

SPECIAL INSTRUCTIONS

SEND INVOICE COPIES TO:

- ☐ COST ACCOUNTING ☐ PROPERTY SECTION
☐ PERSONS LISTED BELOW

D. A. GILLIS
SUPERVISOR, SAFETY
& LOSS PREVENTION

APPROVED BY: D.A. Gillis

DATE

SEND SHIPPING COPY AND PACKING LIST TO: (NAME AND LOCATION)

DECLARED VALUE

ACCOUNT CREDITED

906-966-344-8466000 \$3200
 906-990-344-8490000 \$375
 906-967-344-8462000 \$385
 906-962-344-8462000 \$355

INSTRUCTIONS:

1. Complete this form for equipment, materials, or services for which a Purchase Order has not been issued.
2. May be used for purchases with a total value of \$500 or a total value of \$1,000. If such higher limit is permitted by operating unit approved written procedures.
3. Original and duplicate of invoice(s) must be attached.
4. Sign with full signature in ink in space provided.
5. Forward to appropriate Purchasing Department.

PURCHASING INVOICE APPROVAL

OM 217P

RC-3181

INVOICE RECEIVED FROM		INVOICE DATE	INVOICE NO.	AMOUNT
Chemical Waste Removal		9-29-77	1266	\$4345
CHARGE ACCOUNT NUMBER	DEPARTMENT	LOCATION		
	Chemicals R+D	New Haven		

PURCHASE
AND
RECEIPT

I certify that the materials or services covered by the attached invoice(s) were purchased by me in accordance with applicable standard procedures, and that the goods or services have been received.

SIGNATURE

J. A. G. L. S.

DATE

10/4/77

APPROVAL

Must have requisitioning authority to cover amount of purchase.

SIGNATURE

C. J. Shields

DATE

10/4/77

FOR ACCOUNTING USE ONLY

ACCOUNTING CODE NUMBER	DEBIT AMOUNT	CREDIT AMOUNT

REVIEW BY PURCHASING

SIGNATURE

DATE

Financing 334-4365

CUSTOMER'S ORDER NO.		PHONE		DATE	
NAME		ADDRESS			
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.
PAID OUT		MOSE. RETD.			
QTY	DESCRIPTION			PRICE	AMOUNT
79	5005 Drums of Chemwaste				
RECEIVED BY					TOTAL

1266

All claims and returned goods
MUST be accompanied by this bill.

Thank You

54 ⁸ Polyol
20 Isocyanates
37 LAB PACKS
3 HTH Samples

Total 114

10910027

APPENDIX C

ORDERED FROM

CHEMICAL CONTROL CORPORATION
23 SOUTH FRONT STREET
ELIZABETH NJ 07202

(BUYER)

DATE OF ORDER 7/24/78

PURCHASE ORDER NO. RC-43844

DELIVER TO: OLIN RESEARCH CENTER - GATE "K"
275 SOUTH WINCHESTER AVE
NEW HAVEN, CONN. 06504 10910028

ATTN OF:

INVOICING: MAIL INVOICES IN TRIPLICATE TO:
OLIN CORPORATION
120 LONG RIDGE ROAD
STAMFORD, CONN. 06904

ATTN: ACCOUNTING SERVICES DEPT.

SHIP VIA CHEAPEST WAY UNLESS OTHERWISE SPECIFIED

N/A

DELIVER ON OR BEFORE

Completed

SELLERS QUOTE NO. OR DATE

F.O.B.

N/A

TERMS:

Net 10 days

SUBJECT TO CONN. SALES TAX

YES

NO

QUANTITY RECEIVED	UNIT	QUANTITY ORDERED	UNIT	DESCRIPTION	PRICE	ACCOUNT CHARG.
		19	case	PICK UP AND DESTROY CASES OF HTH GRANULAR e 10.00/ea. MATERIAL PICKED UP AT RICKEL BROS. IN BERGENFIELD, NJ.	\$190.00	351-159
CONFIRMING ORDER - DO NOT DUPLICATE SEE ATTACHED INVOICE APPROVAL						

COMPLETED
RECEIVED
NOV 6 1978

REQUISITION NO. 94	DELIVER TO (NAME AND LOCATION) NA	DEPT. NO. 965	ESTIMATED VALUE \$190.00
REQUISITIONER (SIGNATURE) F. M. Gray	DATE REQUIRED NA	APPROVER (SIGNATURE) KC Dage	DATE 11/3/78
REQUISITIONER'S SUGGESTED VENDOR Chemical Control Corporation, Elizabeth, NJ 07202			

ORDERED FROM

Chemical Control Corp.
23 South Front Street
Elizabeth, NJ 07202

(BUYER)

DATE OF ORDER 9/10/78

PURCHASE ORDER NO. RC-43363

DELIVER TO: OLIN RESEARCH CENTER - GATE "K"
275 SOUTH WINCHESTER AVE.
NEW HAVEN, CONN. 06504

10910029

ATTN OF:

INVOICING: MAIL INVOICES IN TRIPLICATE TO:
OLIN CORPORATION
120 LONG RIDGE ROAD
STAMFORD, CONN. 06904

ATTN: ACCOUNTING SERVICES DEPT.

(SELLER)

SHIP VIA CHEAPEST WAY UNLESS OTHERWISE SPECIFIED

N/A

DELIVER ON OR BEFORE

Completed

SELLERS QUOTE NO. OR DATE

F.O.B.

N/A

TERMS:

Net 10 days

SUBJECT TO CONN. SALES TAX

YES

NO

QUANTITY RECEIVED	UNIT	QUANTITY ORDERED	UNIT	DESCRIPTION	PRICE	ACCOUNT CHARGE
				Emergency pick up and disposal of approximately 3,000 lbs trichloroethylene in damaged containers	\$1500.00	906-S 239-S 000
				Above material picked up at Bunker Hill Warehouse, Paterson, NJ		
				CONFIRMING - DO NOT DUPLICATE		
				COMPLETE		
				RECEIVED		
				NOV 6 1978		
				W. L. READY		
				CG		
				HAD		

REQUISITION NO.

DELIVER TO (NAME AND LOCATION)

DEPT. NO.

ESTIMATED VALUE

85

965

\$1500.00

APPROVED BY (SIGNATURE)

DATE REQUIRED

APPROVED BY (SIGNATURE)

DATE

PROPOSING SUGGESTED VENDOR

Chemical Control Corp., Elizabeth, NJ 07202

203/356-3037

Richard S. Bradley Jr. - mg. Reg. Affair
Rhyon McCarlen - Counsel Legal Affair
203/789-5330

10910030

Olin Corp.

On site June 22, 1982

Shown drums with labels to Olin Corp., said that barrels were theirs and appeared to come from Research Center, New Haven. said a facility in Stamford Ct. had disposed of wastes with Atlas Inc in 1975. who was a principal with Scientific Process Chemical in 1976 switched to Chem Waste Removal, Bridgeport. Their waste was disposed of in the Capovans F.F. Cranston. Material ^{shown} was invoiced to Cranston.

Material was either flammable and/or slightly toxic.
Isocyanate resin (TDI)

Poly ether diol

Had lab pack fatty acid material

Told schedule and ^{state} asked them if they would participate in disposal. Said they would check but claimed Acknowledged material in lab pack as theirs.

Ei. : Letter from Olin, Material Safety Data sheets, Samples, photographs, labels.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

10910031

OCG 008

(EPA)

JAN 20 1983

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

John Henske, President
Olin Corporation
120 Loneridge Road
Stamford, CT 09430

Re: Picillo Waste Disposal Site
Coventry, Rhode Island

Dear Mr. Henske:

This letter is to notify you of potential liability that your company may incur or may have incurred in connection with the above-referenced hazardous waste disposal facility and to request your assistance in cleanup activities at the site.

The U.S. Environmental Protection Agency (EPA) has determined that an actual release or a substantial threat of a release of hazardous substances, as defined in Section 101 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9601 et seq. (CERCLA), has occurred at the above-referenced site. EPA has expended public funds in emergency and planned removal activities in response to immediate environmental hazards on the site. In addition, EPA and the State of Rhode Island have entered a Cooperative Agreement to conduct the longer term remedial phases of the site cleanup. This Cooperative Agreement has provided funding for a number of remedial activities including site security, excavation and disposal of buried drums and contaminated soils, monitoring, sampling and analysis. At present, the Cooperative Agreement is providing funding for a feasibility study and for the design of a final site remedy. Finally, long term remedial actions may be undertaken, including remedial construction, operation and maintenance, as required by site conditions. These response activities are authorized by Section 104(a)(1) of CERCLA.

CONCURRENCES

SYMBOL								
SURNAME	<i>mm</i>							
DATE	1/20							

Under Section 107 of CERCLA, certain responsible parties may be liable for money expended for response activities at the site, including investigation, planning, cleanup measures, and enforcement. Potentially liable parties include the current owners or operators of the site, past owners or operators, and persons who generated or transported the hazardous substances that were disposed of at the site.

Based on information which has been obtained during site cleanup activities, EPA believes that your company may be a responsible party with respect to this site and that your company may therefore be liable for public funds expended in response activities at the site. Before EPA undertakes further response activities, we desire to discuss with the appropriate official of your company voluntary involvement in the measures necessary to remedy the hazardous waste problems presently found at the site. In addition, we seek to discuss the recovery of those costs incurred by EPA in response activities to date and those costs projected to be incurred by EPA under the Cooperative Agreement discussed above.

If your company wishes to pursue a negotiated resolution of its liability under CERCLA or other laws with respect to this site, please so notify EPA, in writing, no later than February 7, 1983. Your letter should indicate the name, address, and telephone number of an appropriate company official for further contact on this matter. It should also include a statement of the type and the extent of the activities your company may be willing to undertake. Where your company is already involved in discussions with state or local authorities, or is engaged in voluntary action to clean up the site, these activities should be continued and their status should be reported in your letter. Your letter should be sent to:

Joel G. Blumstein
U.S. Environmental Protection Agency
Office of Regional Counsel
JFK Federal Building, Room 2203
Boston, MA 02203

If your response indicates your willingness to enter into meaningful negotiations, we will contact your company to schedule a meeting.

You should be aware that letters similar to this one have been sent this date to other parties who EPA believes may be responsible, offering to those parties a similar opportunity to enter negotiations with EPA. If you wish to obtain from EPA a list of those parties, you should submit a written request for that information to Mr. Blumstein.

If you need further information, you may contact Mr. Blumstein at (617) 223-5779. If your written response is not received by February 7, 1983, we will assume that your company has declined to participate in voluntary response activities or in any other negotiated resolution of this matter.

Sincerely yours,

Merrill S. Hohman, Director
Waste Management Division

cc: Regional Counsel, Region I
Director, Office of Emergency and Remedial Response
Director, Office of Waste Programs Enforcement
Office of Enforcement Counsel
Daniel J. Schatz, Rhode Island Department of Attorney General
Thomas Wright, Rhode Island Department of Environmental
Management
Allyn Myles Carnam, Olin Counsel - Regulatory Affairs
- New Haven, CT



CHEMICALS GROUP

120 LONG RIDGE ROAD, P.O. BOX 1355, STAMFORD, CT 06904-1355

10910034

OCCG 009

(EPA)

RECEIVED

February 1, 1983

FEB 19 1983

CERTIFIED MAIL - RETURN RECEIPT REQUESTED WASTE RESPONSE & COMPLIANCE BRANCH

Mr. Joel G. Blumstein
United States Environmental Protection Agency
Office of Regional Counsel
J.F.K. Federal Building, Room 2203
Boston, MA 02203

RECEIVED

FEB 8 1983

REGION I
WASTE MGMT. DIVISION

Re: Piccillo Waste Disposal
Coventry, Rhode Island

Dear Mr. Blumstein:

This is in reference to Mr. Merrill S. Hohman's January 20, 1983 letter to Mr. John Henske of the Olin Corporation and follows our telephone conversation of January 31 relative to the captioned matter.

As your records reflect, on August 13, 1982, I provided you, at your request, all the documents, data and information relating to Olin's chemical waste disposal in the State of Rhode Island. I believe a fair reading of the information we provided you would establish the following:

- (1) Olin did not ship, transfer or otherwise dispose of chemicals at the Piccillo Waste Disposal site.
- (2) The containers discovered at the Piccillo site, allegedly with the Olin label, were intact and did not evidence any leaking or otherwise indicate that the material therein had come in contact with the soil or ground water.
- (3) Olin only shipped a small number of containers to Rhode Island for disposal at the Capuano Brothers site in Cranston.

To date, we have not been provided any data or information, by the State of Rhode Island or the Environmental Protection Agency, to contradict any of the foregoing facts. Your position, as I understand it from our telephone conversation on January 31, is that the EPA is not at liberty to provide such data or information, although you did indicate to me that EPA did believe Olin is a "responsible party" within the meaning of Section 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

Olin, of course, as we have done with both the State of Rhode Island and your office, will continue to cooperate in providing any information and

O L I N C O R P O R A T I O N

respond to appropriate requests that you may make; however, it is very difficult to respond substantively to your January 20 letter unless you provide us with the specific basis on which EPA believes Olin is a responsible party in this matter. We assume that EPA believes it has been able to independently confirm the disposal of Olin chemicals at this site with data and/or information other than what we have provided you. If so, we are herein requesting such data and information.

10910035

Therefore, subject to the foregoing, we are herein formally expressing our willingness to discuss the above matters with you further and to that end, we would appreciate being advised of the date of any meetings between EPA, the State of Rhode Island and the parties your office believes to be responsible in this matter, as early as possible.

Finally, I am herein formally requesting from your office a list of all parties who EPA believes to be liable, under CERCLA, for money expended for response activities at the Piccillo site, including the investigation, planning, clean-up measures and enforcement, and the Cooperative Agreement between the State of Rhode Island and EPA.

Nothing contained herein should be construed as an admission by or binding on the Olin Corporation. The purpose of this letter is to formally respond to EPA's January 20 letter to Olin and to request additional data and information in order for us to further evaluate the Agency's contention that Olin generated chemicals, disposed of at the Piccillo site, which, in fact, will result in a release or threatend release of contaminants to the environment.

If you have any additional questions, please do not hesitate to contact me directly in New Haven (203-789-5330).

Sincerely,



Allyn Myles Carnam
Counsel - Regulatory Affairs.

AMC/deh

cc: Merrill S. Hohman, Director
Waste Management Division
United States Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Dan Schatz, Esquire
Department of the Attorney General
72 Pine Street
Providence, Rhode Island



10910030

OCG 010
(EPA)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

February 11, 1983

Allyn Myles Carnam, Esq.
Counsel - Regulatory Affairs
Olin Corporation
120 Long Ridge Road
P.O. Box 1355
Stamford, CT 06904-1355

Re: Picilló Waste Disposal Site - Letter Recipients

Dear Mr. Carnam:

In accordance with your recent request, enclosed please find a list of those parties who were sent letters similar to the January 20, 1983 letter sent to you from Merrill S. Hohman, Region I Waste Management Division Director.

Sincerely,

Joel Blumstein, Attorney
Office of Regional Counsel

Enclosure

REPORT OF A PHONE CALL
VISIT

10910037

OCG 0-11-
(EPA)

In 1 Out 1

File Picilla/Olin

Date 1/31/93 Time 1:30

Routing

Person Contacted Allen Carnoin

Phone No. 203-789-5330

Location Olin

Subject Picilla Notice Letter

Summary I explain coordination w/ State of RI
Olin position - didn't send material directly to Picilla; material
isn't hazardous; material that was there is intact. Would like
us to dismiss them - I said we would not do that
wanted to know what evidence was - I said I was not
prepared to exchange info

Action Required

Signature [Signature]

1-FOI-94-84
APR 4, 1984
10910038
PAD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCG 012
(EPA)

TO: United States Environmental Protection Agency
Freedom of Information Office
Room 2303
John F. Kennedy Federal Building
Boston, MA 02203

RE: Freedom of Information Act Request

DATE: March 30, 1984

Pursuant to the provisions of the Freedom of Information Act, 5 U.S.C. §552, the undersigned, in his capacity as counsel to Olin Corporation, requests access to the following documents and records:

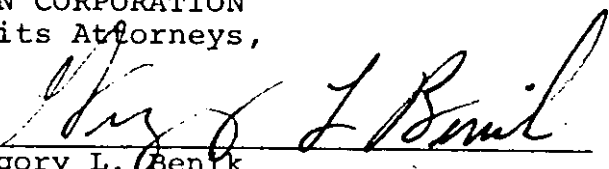
All documents and records which concern, relate, or refer to any consulting or technical studies or services undertaken by Tighe & Bond/SCI, Boston, Massachusetts, in connection with the Picillo Hazardous Waste Site, Coventry, Rhode Island, including, but not limited to:

- any and all bid forms, bids received and contracts;
- any and all technical reports and studies, including all draft Remedial Investigation/Feasibility Studies, prepared by Tighe & Bond/SCI;
- any and all documents which concern, refer, or relate to payments made to Tighe & Bond/SCI;
- any and all documents which concern, refer, or relate to the decision to discontinue the use and terminate the services of Tighe & Bond/SCI.

If all or any part of this request is denied, please cite the specific exemptions(s) which you believe justifies your refusal to release the documents and records.

As you know, the Freedom of Information Act requires a response within 10 days and I look forward to your response within that time period.

OLIN CORPORATION
By its Attorneys,



Gregory L. Benik
HINCKLEY & ALLEN
2200 Fleet National Bank Building
Providence, Rhode Island 02903
(401) 274-2000

REPORT OF A PHONE CALL
VISIT

OCG 013
(EPA)

In _____ Out ✓

10010040
File _____

Date 4/17/84 Time 5:00

Routing _____

Person Contacted Greg Benik

Phone No. _____

Location _____

Subject _____

Summary Rogers FOI - DCLA proposal may have relevance
now that CLA is doing work on site - he couldn't elaborate.
He will check w/ Rogers + get back to me

Benik FOI - Doesn't want to put us through duplicative
process. He agreed to put his request on hold - his request
is incorporated into Rogers; he can later revise
I will send letter setting this out.

Action Required _____

Signature Joel B Hunter



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING BOSTON MASSACHUSETTS 02203

April 24, 1984

Gregory L. Benik, Esq.
Hinckley & Allen
2200 Fleet National Bank Building
Providence, RI 02903

Re: 1-FOI-94-84

Dear Greg:

This is to confirm our conversation of April 17, 1984 concerning your Freedom of Information Act request of March 30, 1984 for certain information related to the Picillo Hazardous Waste site.

As agreed, the Agency will not at this time respond to your request. Rather, your request will be considered incorporated within the outstanding FOI request of James A. Rogers for all information related to the Picillo site, the responses to which have been and will be shared with you. If following the provision of the remaining documents to Mr. Rogers and issuance of the initial determination - which will occur shortly after resolution of the GCA proposal issue which we discussed - you believe certain items have not been either provided or denied, you may revive your request for those specific items.

If you have any questions on the above, please give me a call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joel Blumstein", is written over the typed name.

Joel Blumstein
Office of Regional Counsel

cc: S. Santos, WMD
E. Sullivan, PAO

10010042

FROM Hinckley and Allen, Providence, RI			CONTROL NO. 1-FOI-94-84
SUBJECT AND DATE FOIA request for certain info pertaining to Picillo.... lwttter dated 3/30 from Gregory Benik FYI			DATE REC'D April 4, 1984
			DUE DATE April 18, 1984
REFERRED (1) XXXXX Mel Hohman Dir, Waste Mgmt Div.	(2) / Pam Hill, RC's Office	(3)	(4)
DATE 4/4/84	4/4/84		
REPLY SENT TO			DATE RELEASED
REMARKS Direct reply. Please reference 1-FOI-94-84 on all correspondence and send a copy of reply to PAO.			ACKNOWLEDGED - DATE <input type="checkbox"/>
			NO ANSWER NEEDED <input type="checkbox"/> (Explain in remarks)

EPA Form 5180-1 (6-72)
REPLACES FWPCA FORM 72 AND
NEW-73 WHICH MAY NOT BE USED.

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE

10910043

OCG 015

Olin Chemical Group File

Court documents relevant to this file are:

DEP 098

DEP 106

photographs relevant to this file are:

Pho 040

Pho 041

UNITED STATES POSTAL SERVICE^{PM}

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN
TO



Environmental Protection Agency

Office of Regional Counsel

Room 2203

U.S. Federal Building

Boston, MA 02203

ATTN
Dave Marshall R RC

(Name of Sender)

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

(City, State, and ZIP Code)



PENALTY FOR PRIVATE
USE, \$300

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
 2. ☐ Restricted Delivery.

3. Article Addressed to: *Teresa Ciccotelli*

*0111 Corp.
 120 Long Bridge Rd
 Stamford CT 06904*

4. Type of Service:

- ☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

Article Number

*P642
 141
 502*

Always obtain signature of addressee or agent and
DATE DELIVERED.

5. Signature — Addressee

X

6. Signature — Agent

X

Martha E. van Amke

7. Date of Delivery

7/15/85

8. Addressee's Address (ONLY if requested and fee paid)

10910044

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

**RETURN
TO**



Environmental Protection Agency
Office of Regional Counsel

(Name of Sender)

Room 2203

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

U.S. Federal Building
Boston, MA 02203

(City, State, and ZIP Code)

ATTN
Dave Markell

RRC

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
 2. ☐ Restricted Delivery.

3. Article Addressed to:

Greg Benik
 2260 Fleet Nat
 Bank Bldg
 Providence RI 02903

4. Type of Service:

- ☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

Article Number

P264
 141
 301

Always obtain signature of addressee or agent and **DATE DELIVERED.**

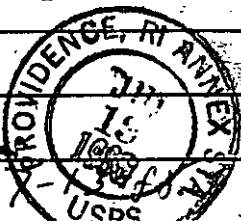
5. Signature — Addressee

X

6. Signature — Agent

X

7. Date of Delivery



8. Addressee's Address (ONLY if requested and fee paid)

10910045

10310048

Attorneys at Law

[illegible]

WILLIAM F. BROWN
SANDRA L. BROWN
PAUL C. BROWN JR.
MARGARET A. BROWN
NANCY P. BROWN
MICHAEL C. BROWN
MILLIE M. BROWN
ANTHONY A. BROWN
JAMES P. BROWN
MARY LOU BROWN
GIRARD P. BROWN
SCOTT E. BROWN
NANCY M. BROWN
ROBERT C. BROWN
JOHN R. BROWN JR.

THOMAS J. HOGAN
JOHN A. FANNING
JAMES M. PROTEAR
COUNSELLOR

STUART H. LUTHER
MAYNOR S. WILKINSON
NORMAN FIELD
THOMAS J. HOGAN
COUNSELLOR

¹ACT, National Measurement, 2011.

July 1, 1985

Heather
Ken

Re: Picillo Farm Site, Coventry, Rhode Island

I am writing on behalf of the following companies, each of which received a letter from EPA dated April 17, 1985 advising it that EPA considered it a potentially responsible party with respect to the Picillo site: American Cyanamid Co.; Ashland Chemical Co.; Exxon Research & Engineering Co.; GAF Corporation; Monsanto Co.; Rutgers University; Hydron Laboratories; General Electric Company; Otis Corporation; Rohm & Haas Company; and Morton-Thiokol Corporation. This letter is without prejudice to the position of these companies that they are not liable with respect to the conditions at the Picillo site or otherwise.

• AETC
~~CATC~~
Cepren

At the May 3rd meeting held by EPA regarding the Picillo Site, EPA requested that the potentially responsible parties advise EPA by July 1, 1985 of their willingness to participate in settlement negotiations. We wish to advise you that we would be pleased to enter into such negotiations at the earliest practicable time.

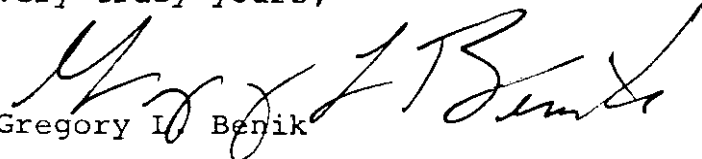
We also note that by letter to Richard H. Johnson dated June 12, 1985, EPA requested that one or more of the potentially responsible parties indicate whether they would be prepared to undertake the remedial action selected by EPA. At that time, we were awaiting the draft record of decision, which according to EPA, was to be released to the PRPs on June 15, 1985. Since the draft ROD has not been released and EPA has not selected a remedy at this time, it is, as you can imagine, not possible to make such a commitment. However, we are open to discussing that possibility.

10910049

Merrill S. Hohman
July 1, 1985
Page Two

We look forward to discussing these matters further with you and are hopeful that our upcoming negotiations will result in a fair and equitable resolution.

Very truly yours,


Gregory L. Benik

cc: Attorney General Arlene Violet
John R. Moebes, Chief, Superfund Branch
All Potentially Responsible Parties
David W. Markell, Esq.

P. 642 141 502

RECEIPT FOR CERTIFIED MAILNO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

Sent to <i>TERESA Ciccotelli</i>	
Street and No. <i>120 Long Ridge Rd</i>	
P.O., State and ZIP Code <i>STAMFORD CT 06904</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date

10910051

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)**

1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.



10910050
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 11, 1985

Teresa Ciccotelli
Olin Corp.
120 Long Ridge Road
Stamford, CT 06904

Re: Picillo

Dear Ms. Ciccotelli:

By letter dated April 17, 1985, EPA invited the companies that it considers to be the potentially responsible parties (PRPs) for the Picillo Site to a meeting on May 3, 1985. At the May 3, 1985 meeting, EPA summarized the status of efforts to remediate the problems at the Site, and established a schedule for negotiating with the PRPs concerning the design and construction of the selected remedial alternative and the reimbursement of EPA's past costs at the Site. The Agency also required that the PRPs notify it no later than July 1, 1985 if they are willing to participate in settlement negotiations concerning these issues (the scope of these negotiations subsequently was expanded by the State of Rhode Island's decision to participate therein).

EPA has received a single letter written on behalf of eleven companies advising the Agency that these companies "would be pleased to enter into such negotiations at the earliest practicable time." In order to facilitate the negotiations process, EPA and the State of Rhode Island have scheduled a meeting with these eleven companies for July 19, 1985 at 10:00 a.m., in Room 2208 of the John F. Kennedy Federal Building, Boston, Massachusetts. Defendants in the State of Rhode Island's federal court action which have not been named as PRPs by EPA are being invited to this meeting as well.

Should you have any questions, please contact the undersigned at (617) 223-0400 or Ken Wenger at (617) 233-1957.

Sincerely,

David L. Markell

P 642 141 501

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to <i>Greg Benik</i>	
Street and No. <i>2200 Fleet Nat. Bldg</i>	
P.O., State and ZIP Code <i>PROV, RI 02903</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date

10910052

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)**

1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

2200 FLEET NATIONAL BANK BUILDING
PROVIDENCE, RHODE ISLAND 02903
401 274-2000
TELECOPIER, 277-9600

10910046

THOMAS W. WATSON
ROBERT F. RICHARD
BENEDICT J. DINI
RICHARD F. TAPLES
ROBERT W. THADD
MICHAEL W. BILLINGS
JOACHIM A. WIESSFELD
JAMES A. JACKSON
JOHN R. ALLEN
EDWIN G. TORRANCE
MICHAEL A. SILVERSTEIN
THOMAS D. GIDLEY
JACQUES V. WOPKINS
RICHARD H. PIERCE
JOHN J. PENDERGAST III
NOEL M. FIELD, JR.
ROBERT W. LOWGREEN
MALCOLM FARMER III
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CHARLES S. SOLODOFF
JAMES E. KEELY
H. PETER OLSEN
EDMUND C. BENNETT
MICHAEL P. DIPIANTI
E. IEROME BATTY
MATTHEW T. MARCELLO III
DORIS JAMILICHT
THOMAS R. COURAGE

JOSEPH A. MICLORE
HOWARD F. MARCOT
MARGARET O. MARSH
WILLIAM O. TRIEN JR.
MICHAEL J. SHEPHERD
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PAUL A. SILVER
CROGGY L. BENIX
ROBERT C. BRUNS
MICHAEL G. SMALL
PAUL V. CLAUDIO
DAVID J. TRACY
WILLIAM R. GRIMM
GORDON A. CARPENTER
PASCO CASBARRO JR.
EILEEN G. COONEY
MARY A. DINGLEY
JOSEPH P. CURRAN
MICHAEL G. SARLI
MELANIE W. FAMIGLIETTI
KRISTIN A. DAYQUIER
JAMES P. MARUSAK
MARY LOU SAUAGE
GERARD R. COULET
SCOTT E. COOPER
NANCY M. HARRIS
ROBERT C. CORRENTE
JOHN R. GOWELL, JR.

JOSEPH A. L. LIND
MARK BARRETT HEARNES
DAVID A. NELL
STEPHEN H. BURKE
JONATHAN N. SAVAGE
KUSAN MANNING
DAVID H. PERRARA
GERALD J. PETRO
THOMAS A. HANNA
REBEKAH HURLEY
LLOYD R. CANNERY
JONATHAN N. MASLIN
GAIL A. THORPE
THOMAS J. PAOLINO
JOHN H. FANNING
JAMES DIPIRETE JR.
COUNSEL
STUART H. TUCKER
MASON B. MERCHANT
NOEL M. FIELD
THOMAS J. HOUGH
RETIRED

*Admitted in Massachusetts only

HINCKLEY, ALLEN, TOBIN & SILVERSTEIN

Attorneys at Law

July 1, 1985

Merrill S. Hohman, Director
Waste Management Division
United States Environmental
Protection Agency - Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Re: Picillo Farm Site, Coventry, Rhode Island

Dear Mr. Hohman:

I am writing on behalf of the following companies, each of which received a letter from EPA dated April 17, 1985 advising it that EPA considered it a potentially responsible party with respect to the Picillo site: American Cyanamid Co.; Ashland Chemical Co.; Exxon Research & Engineering Co.; GAF Corporation; Monsanto Co.; Rutgers University; Hydron Laboratories; General Electric Company; Olin Corporation; Rohm & Haas Company; and Morton-Thiokol Corporation. This letter is without prejudice to the position of these companies that they are not liable with respect to the conditions at the Picillo site or otherwise.

At the May 3rd meeting held by EPA regarding the Picillo Site, EPA requested that the potentially responsible parties advise EPA by July 1, 1985 of their willingness to participate in settlement negotiations. We wish to advise you that we would be pleased to enter into such negotiations at the earliest practicable time.

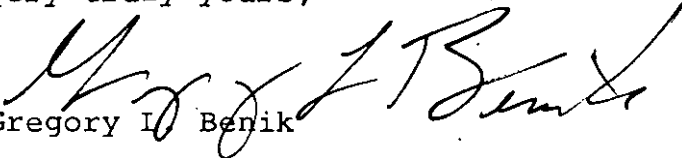
We also note that by letter to Richard H. Johnson dated June 12, 1985, EPA requested that one or more of the potentially responsible parties indicate whether they would be prepared to undertake the remedial action selected by EPA. At that time, we were awaiting the draft record of decision, which according to EPA, was to be released to the PRPs on June 15, 1985. Since the draft ROD has not been released and EPA has not selected a remedy at this time, it is, as you can imagine, not possible to make such a commitment. However, we are open to discussing that possibility.

Merrill S. Hohman
July 1, 1985
Page Two

10910047

We look forward to discussing these matters further with you and are hopeful that our upcoming negotiations will result in a fair and equitable resolution.

Very truly yours,


Gregory I. Benik

cc: Attorney General Arlene Violet
John R. Moebes, Chief, Superfund Branch
All Potentially Responsible Parties
David W. Markell, Esq.



10910053

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 11, 1985

Gregory L. Benik
Hinckley, Allen, Tobin & Silverstein
2200 Fleet National Bank Building
Providence, RI 02903

Re: Picillo

Dear Mr. Benik:

By letter dated April 17, 1985, EPA invited the companies that it considers to be the potentially responsible parties (PRPs) for the Picillo Site to a meeting on May 3, 1985. At the May 3, 1985 meeting, EPA summarized the status of efforts to remediate the problems at the Site, and established a schedule for negotiating with the PRPs concerning the design and construction of the selected remedial alternative and the reimbursement of EPA's past costs at the Site. The Agency also required that the PRPs notify it no later than July 1, 1985 if they are willing to participate in settlement negotiations concerning these issues (the scope of these negotiations subsequently was expanded by the State of Rhode Island's decision to participate therein).

EPA has received a single letter written on behalf of eleven companies advising the Agency that these companies "would be pleased to enter into such negotiations at the earliest practicable time." In order to facilitate the negotiations process, EPA and the State of Rhode Island have scheduled a meeting with these eleven companies for July 19, 1985 at 10:00 a.m., in Room 2208 of the John F. Kennedy Federal Building, Boston, Massachusetts. Defendants in the State of Rhode Island's federal court action which have not been named as PRPs by EPA are being invited to this meeting as well.

Should you have any questions, please contact the undersigned at (617) 223-0400 or Ken Wenger at (617) 233-1957.

Sincerely,

David L. Markell

2200 FLEET NATIONAL BANK BUILDING
PROVIDENCE, RHODE ISLAND 02903
401 274-2000
TELECOPIER: 277-9600

EDWARD M. WATSON
ROBERT F. PICKARD
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MARGARET D. FARRELL
WILLIAM J. O'BRIEN, JR.
MERRILL W. SHERMAN
MICHAEL B. NULMAN*
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ROBERT C. BRUNS
RICHARD G. SMALL*
PAUL V. CURCIO
DAVID J. TRACY*
WILLIAM R. GRIMM*
GORDON A. CARPENTER*

10910054
PASCO GASBARRO JR.*
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KRISTIN A. DEKUIPER*
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MARK C. HADDEN
SEAN CONNELLY
THOMAS J. PAOLINO
JOHN H. FANNING
JAMES DIPRETE, JR.
ROBERT P. WEINTRAUB**
COUNSEL
STUART H. TUCKER
NOEL M. FIELD
THOMAS J. HOGAN
RETIRED

*Also admitted in Massachusetts
**Admitted in Massachusetts only

HINCKLEY, ALLEN, TOBIN & SILVERSTEIN

Attorneys at Law

April 25, 1985

RECEIVED

APR 30 1985

REGION I
OFFICE OF REGIONAL COUNSEL

Merrill S. Hohman, Director
Waste Management Division
U.S. Environmental Protection Agency
Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Re: Picillo Site

Dear Mr. Hohman:

This letter is submitted on behalf of the following corporations which have been identified pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§9601 et seq., as potentially responsible parties by EPA and the State of Rhode Island in connection with the above matter: Amrican Cyanamid Corporation; Ashland Chemical Corporation; Exxon Research & Engineering Company; GAF Corporation; General Electric Company; Hydron Laboratories, Inc.; Monsanto Corporation; Morton-Thiokol Corporation; Olin Corporation; Rohm & Haas Company; and Rutgers University.

As you know, the Remedial Investigation/Feasibility Study ("RI/FS") prepared by GCA Corporation regarding the Picillo Site was released to the public on April 8, 1985. EPA and the State of Rhode Island held an informational meeting on the RI/FS on April 23, 1985, and we have been advised that a public hearing to discuss the results of the RI/FS as well as possible remedial actions to be taken at the Picillo Site will be held on May 1, 1985. We understand that based upon the conclusions in the RI/FS and comments on the RI/FS made at the upcoming public hearing, EPA and the State of Rhode Island will make a decision regarding remedial action to be taken at the Picillo Site. Moreover, we have been advised that the comment period on the RI/FS will close on May 15, 1985.

Since the public hearing and comment period play a critical role in the remedial action option selection process, we believe that fundamental fairness requires that potentially responsible

Merrill S. Hohman, Director
Waste Management Division
U.S. Environmental Protection Agency
April 25, 1985
Page Two

parties be given an adequate opportunity to meaningfully review and comment on the RI/FS. Neither EPA nor the State of Rhode Island delivered a copy of the RI/FS to any representative of the above corporations at the time of its release. Consequently, as a result of time delays in obtaining a copy of the RI/FS from State officials and photocopying and distributing the document, technical representatives of the generators did not receive the RI/FS until April 25, 1985. This makes it virtually impossible for the generators to critically review the RI/FS and present any serious evaluation of the remedial action options contained in the RI/FS within the schedule contemplated by EPA.

We also note that the results of the ground and surface water samples taken in December 1984 do not appear to have been considered in the RI/FS. Nor have those results been made available to the public.

Accordingly, we request that the public comment period be extended to May 31, 1985, and that the most recent analytical results be released to the public at this time. This will afford the generators with a full and adequate opportunity to analyze this critical document.

It is our understanding that the Picillo Site does not presently constitute an immediate threat to public health or the environment. Thus this short postponement will not prejudice EPA or the State of Rhode Island or result in any adverse public health or environmental impact. More significantly, EPA and the State of Rhode Island have taken years to study the Picillo Site and develop cleanup options. We believe that principles of due process and fundamental fairness dictate that those parties that EPA and the State of Rhode Island seek to hold responsible for the Site remedial action have the opportunity, along with the general public, to meaningfully review the RI/FS.

Very truly yours,


Gregory L. Benik

/1

cc: Michael DeLand, Regional Administrator
U.S. Environmental Protection Agency

Pat Parenteau, Esq., Regional Counsel,
U.S. Environmental Protection Agency

David Markel, Esq., Office of Regional Counsel,
U.S. Environmental Protection Agency

Attorney General Arlene Violet
Robert Bendick, Director, Rhode Island
Department of Environmental Management
All Generators

10910056



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

June 23, 1982

HAND DELIVERED

John P. Leo, Engineer
c/o Picillo Site
Coventry, Rhode Island

Re: Picillo Property
Coventry, Rhode Island

Dear Mr. Leo:

This is to confirm a site visit, to the above-captioned property, by R. S. Hendey of Olin Corporation and the undersigned, at your invitation, for the purpose of facilitating the identification of any material generated by the Olin Corporation or disposed of by Olin, found at the above-captioned site. For the record, and as we discussed during our visit, Olin's internal, waste disposal records do not reflect any chemicals, waste materials or any other compounds being shipped to the above-captioned location. Our records, however, do indicate two shipments of materials to the Capuano Brothers landfill in Cranston, Rhode Island.

Both of the shipments to Rhode Island were made through Chemical Waste Removal, Inc., Bridgeport, Connecticut. The first shipment occurred on or about August 31, 1977 and the second shipment was made, also through Chemical Waste Removal, on September 29, 1977. Our records do not specifically identify the materials sent to Cranston; however, the waste do fall into three general categories:

1. HTH® samples (calcium hypochlorite)
2. Isocyanates
3. Polyols

During the course of our site visit to the Picillo property, we inspected two 55 gallon drums which you believed may have originated at the Olin Corporation. You also noted two other containers, either sent to or from Olin in New Haven, Connecticut. These two containers

My Direct Dial Number:

203-789-5330

O L I N C O R P O R A T I O N

John P. Leo
Page 2
June 23, 1982

10910057

consisted of a 5 gallon pail with the designation Emery 9877-U fatty acid and a smaller container apparently delivered by the Humphrey Chemical Company, North Haven, Connecticut to Olin in New Haven.

I have been able to develop some additional information for you in connection with the foregoing and I am also providing you herewith product data sheets and bulletins, material safety data sheets and other identified data and information concerning the three compounds described above as well as other chemicals for which you requested physical property data.

First, in connection with the material apparently mailed to Olin from the Humphrey Chemical Company, I have spoken with our Sam Trotz, Ph.D., and he advises me that it is likely that the material sent by Humphrey, in the four small ampules, is 2,4-difluoronitrobenzene. This compound is an intermediate in the manufacture of difluoroaniline, itself an intermediate in the manufacture of an oral drug preparation manufactured and distributed by Merck Company. For your information, I am herewith enclosing Olin's Material Safety Data Sheet for 2,4-difluoronitrobenzene.

Secondly, we have yet to identify the waxy, viscous light brown material found in the 5 gallon pail. However, I will still continue to interview appropriate personnel in New Haven to attempt to ascertain the nature of this material. If I am able to develop some more definitive information on the identity of this substance, I will contact you immediately.

Thirdly, in connection with the isocyanate material which may be present on-site, I am herewith providing you with the following information:

- (a) Technical data and information furnished us by the Upjohn Polymer Chemicals Company concerning the polymeric isocyanurate compounds we purchase from them. This information and materials include two technical bulletins and a material safety data sheet.
- (b) Olin's material safety data sheet, product data bulletin and product storage and handling bulletin for our isocyanate family of chemicals.
- (c) A general Olin bulletin on toluene diisocyanate (750-008).

Fourth, I am enclosing herewith some general data and information concerning our polyol compounds manufactured by Olin. This information will provide you with the relevant physical properties for all our polyol products:

John P. Leo
Page 3
June 23, 1982

10910058

- (a) material safety data sheet and application data bulletin for Poly-G® 32-56
- (b) material safety data sheet and application data bulletin for Poly-G® 71-530
- (c) material safety data sheet and product data bulletin for Thermolin® RF-230

Fifth, I am also herewith enclosing for your information and use Olin's material safety data sheet for calcium hypochlorite. Inter alia, this information includes a description of the physical properties of calcium hypochlorite.

As we discussed, I found it very difficult to precisely identify the nature of the material in any of the drums or containers you believe have come from Olin. We also discussed the fact that Olin's records, in addition to not reflecting any shipments to the Picillo Property, only indicate, in a general way, the nature of the materials (see description above) sent to the Capuano Brothers' landfill in Cranston, Rhode Island. With this as background, I suspect you can appreciate the difficulty we are having in identifying the substances involved with any degree of precision. Nonetheless, we are herewith providing you with data and information, concerning the physical properties, of the two main chemical categories or families described above, viz; the isocyanates and polyols.

I am also compelled to point out that in addition to any of the materials found at the Picillo property not being sent directly to this site, we, as you might expect, have no way of knowing whether any of the materials originally sent to Cranston, by Olin, are, in fact, still in the original container(s), or whether other compounds have been substituted for or reacted with these materials. I am sure you have dealt with this potential problem in the past but I think it is sufficiently important to raise it with you as it may apply to the containers inspected by us.

I hope the foregoing has been helpful and the enclosures in someway facilitate your final disposal of the above waste materials. We will continue, at this end, to seek to generate any additional information which may be of assistance to you. However, I trust you will feel free to contact me in New Haven or R. S. Hendey in Stamford in connection with anything we discussed during our site visit on Tuesday, June 22, or any other related matter.

John P. Leo
Page 4
June 23, 1982

10910059

Mr. Hendey and I again want to thank you and your associates, especially Mr. Brodd, for all the help and information you provided us during our visit and again, we trust you will feel free to call upon us in the future if we can be of any additional assistance to you.

Sincerely,



Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosures

RECEIVED



10910060 JUL 2 1982

RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, NEW HAVEN, CONNECTICUT 06511
DEPT. OF ATTORNEY GENERAL
DIV. OF PUBLIC PROTECTION

(203) 789-5000

June 23, 1982

HAND DELIVERED

John P. Leo, Engineer
c/o Picillo Site
Coventry, Rhode Island

Re: Picillo Property
Coventry, Rhode Island

Dear Mr. Leo:

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John P. Leo
Page 4
June 23, 1982

10910063

Mr. Hendey and I again want to thank you and your associates, especially Mr. Brodd, for all the help and information you provided us during our visit and again, we trust you will feel free to call upon us in the future if we can be of any additional assistance to you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allyn Myles Carnam".

Allyn Myles Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

10910064

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

February 11, 1983

Allyn Myles Carnam, Esq.
Counsel - Regulatory Affairs
Olin Corporation
120 Long Ridge Road
P.O. Box 1355
Stamford, CT 06904-1355

Re: Picillo Waste Disposal Site - Letter Recipients

Dear Mr. Carnam:

In accordance with your recent request, enclosed please find a list of those parties who were sent letters similar to the January 20, 1983 letter sent to you from Merrill S. Hohman, Region I Waste Management Division Director.

Sincerely,

[Handwritten signature]
Joel Blumstein, Attorney
Office of Regional Counsel

Enclosure

10910065

March 22, 1985

Gregory L. Benik, Esquire
Hinckley, Allen, Tobin & Silverstein
2200 Fleet National Bank Building
Providence, RI 02903

Dear Greg:

As you know, I am now serving as the Region I attorney for the Picillo site. As a result, your letter to Joel Blumstein, dated January 31, 1985, has been forwarded to me for reply.

I am aware that sampling recently has taken place at the Picillo site, and am agreeable to exchanging results with the generator group.

Please contact me if you have any questions.

Sincerely,

David L. Markell

RRC:DM:ch:disk2

CONCURRENCES

SYMBOL	SURNAME	DATE						



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

10910066

July 10, 1985

Gregory L. Benik, Esq.
Hinckley, Allen, Tobin &
Silverstein
2200 Fleet National Bank Bldg.
Providence, RI 02903

Re: Picillo

Dear Greg:

As you are aware, by letter dated April 17, 1985, EPA invited the companies that it considers to be the potentially responsible parties (PRPs) for the Picillo Site to a meeting on May 3, 1985. At the May 3, 1985 meeting, EPA summarized the status of efforts to remediate the problems at the Site, and established a schedule for negotiating with the PRPs concerning the design and construction of the selected remedial alternative and the reimbursement of EPA's past costs at the Site. The Agency also required that the PRPs notify it no later than July 1, 1985 if they are willing to participate in settlement negotiations concerning these issues (as you are aware the scope of these negotiations subsequently was expanded by the State of Rhode Island's decision to participate therein).

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Should you have any questions, please contact the undersigned at (617) 223-0400 or Ken Wenger at (617) 233-1957.

Sincerely,

David L. Markell

July 10, 1985

Gregory L. Benik, Esq.
Hinckley, Allen, Tobin &
Silverstein
2200 Fleet National Bank Bldg.
Providence, RI 02903

Dear Greg:

As you are aware, by letter dated April 17, 1985, EPA invited the companies that it considers to be the potentially responsible parties (PRPs) for the Picillo Site to a meeting on May 3, 1985. At the May 3, 1985 meeting, EPA summarized the status of efforts to remediate the problems at the Site, and established a schedule for negotiating with the PRPs concerning the design and construction of the selected remedial alternative and the reimbursement of EPA's past costs at the Site. The Agency also required that the PRPs notify it no later than July 1, 1985 if they are willing to participate in settlement negotiations concerning these issues (as you are aware the scope of these negotiations subsequently was expanded by the State of Rhode Island's decision to participate therein).

EPA has received a single letter written on behalf of eleven companies advising the Agency that these companies "would be pleased to enter into such negotiations at the earliest practicable time." In order to facilitate the negotiations process, EPA has scheduled a meeting with these eleven companies for July 19, 1985 at 10:00 a.m., in Room 2208 of the John F. Kennedy Federal Building, Boston, Massachusetts. Defendants in the State of Rhode Island's federal court action which have not been named as PRPs by EPA are being invited to this meeting as well.

Should you have any questions, please contact the undersigned at (617) 223-0400 or Ken Wenger at (617) 233-1957.

Sincerely,

David L. Markell

RRC:Dave:rl:disk 4

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

HWC
Frd
7/10/85

1-FOI-94-84
APR 4, 1984
10910068
PAO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

TO: United States Environmental Protection Agency
Freedom of Information Office
Room 2303
John F. Kennedy Federal Building
Boston, MA 02203

RE: Freedom of Information Act Request

DATE: March 30, 1984

Pursuant to the provisions of the Freedom of Information Act, 5 U.S.C. §552, the undersigned, in his capacity as counsel to Olin Corporation, requests access to the following documents and records:

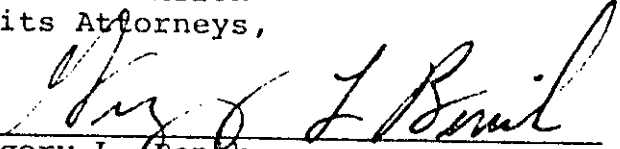
All documents and records which concern, relate, or refer to any consulting or technical studies or services undertaken by Tighe & Bond/SCI, Boston, Massachusetts, in connection with the Picillo Hazardous Waste Site, Coventry, Rhode Island, including, but not limited to:

- any and all bid forms, bids received and contracts;
- any and all technical reports and studies, including all draft Remedial Investigation/Feasibility Studies, prepared by Tighe & Bond/SCI;
- any and all documents which concern, refer, or relate to payments made to Tighe & Bond/SCI;
- any and all documents which concern, refer, or relate to the decision to discontinue the use and terminate the services of Tighe & Bond/SCI.

If all or any part of this request is denied, please cite the specific exemptions(s) which you believe justifies your refusal to release the documents and records.

As you know, the Freedom of Information Act requires a response within 10 days and I look forward to your response within that time period.

OLIN CORPORATION
By its Attorneys,



Gregory L. Benik
HINCKLEY & ALLEN
2200 Fleet National Bank Building
Providence, Rhode Island 02903
(401) 274-2000

Olin Corp.

203/356-3037

Richard S. Bradley Jr. - Reg. Em. Affair
 Rhyn McCarlin - Counsel Legal Affairs
 203/789-5330

On site June 22, 1982

Show drums with labels to Olin Corp., said that barrels were theirs and appeared to come from Research Center, New Haven and a facility in Stamford Ct. had disposed of wastes with Atlas Inc in 1975 who was a principal with Scientific Process Chemical in 1976 transferred to Chem Waste Removal, Bridgeport Ct. Their waste was disposed of in the Capavans J.F. Cranston. Material ^{shown} was inquired to Cranston.

Material was either flammable and/or slightly toxic.
 Isocyanate resin (TDI)

Poly ether diol

Had lab pack fatty acid material

Told schedule and ^{state} asked them if they would participate in disposal. Said they would check but claimed Acknowledged material in lab pack as theirs.

Ev. : Letter from Olin, Material Safety Data sheets, Samples, photographs, labels.

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, and 3 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



10910071

**RETURN
TO**



Joel Blumstein, Attorney

(Name of Sender)

Office of Regional Counsel

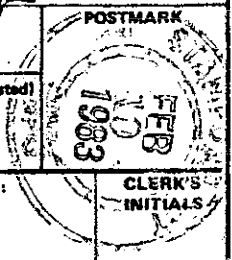
U.S. Environmental Protection Agency

(Street or P.O. Box)

JFK Federal Building, Room 2203

Boston, MA 02203

(City, State, and ZIP Code)

⑤ SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one.) <input checked="" type="checkbox"/> Show to whom and date delivered. \$ <input type="checkbox"/> Show to whom, date and address of delivery. \$ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. \$ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ ____		
(CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: John Henske, President Olin Corporation 120 Loneridge Road Stamford, CT 09430		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P283699717	
(Always obtain signatures of addressee or agent)		
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
4. DATE OF DELIVERY		POSTMARK 
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS

P 283 699 717

RECEIPT FOR CERTIFIED MAIL**NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL**

(See Reverse)

SENT TO John Henske, Pres.
Olin Corporation

STREET AND NO.

120 Loneridge Road

P.O., STATE AND ZIP CODE

Stamford, CT 09430

POSTAGE

\$

CONSULT POSTMASTER FOR FEES

CERTIFIED FEE

¢

OPTIONAL SERVICES

SPECIAL DELIVERY

¢

RESTRICTED DELIVERY

¢

RETURN RECEIPT SERVICE

SHOW TO WHOM AND
DATE DELIVERED

¢

SHOW TO WHOM, DATE,
AND ADDRESS OF
DELIVERY

¢

SHOW TO WHOM AND DATE
DELIVERED WITH RESTRICTED
DELIVERY

¢

SHOW TO WHOM, DATE AND
ADDRESS OF DELIVERY WITH
RESTRICTED DELIVERY

¢

TOTAL POSTAGE AND FEES

\$

POSTMARK OR DATE

10910071A

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)**

1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, **leaving the receipt attached**, and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified-mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in Item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

JAN 20 1983

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

John Henske, President
Olin Corporation
120 Loneridge Road
Stamford, CT 09430

Re: Picillo Waste Disposal Site
Coventry, Rhode Island

Dear Mr. Henske:

This letter is to notify you of potential liability that your company may incur or may have incurred in connection with the above-referenced hazardous waste disposal facility and to request your assistance in cleanup activities at the site.

The U.S. Environmental Protection Agency (EPA) has determined that an actual release or a substantial threat of a release of hazardous substances, as defined in Section 101 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9601 et seq. (CERCLA), has occurred at the above-referenced site. EPA has expended public funds in emergency and planned removal activities in response to immediate environmental hazards on the site. In addition, EPA and the State of Rhode Island have entered a Cooperative Agreement to conduct the longer term remedial phases of the site cleanup. This Cooperative Agreement has provided funding for a number of remedial activities including site security, excavation and disposal of buried drums and contaminated soils, monitoring, sampling and analysis. At present, the Cooperative Agreement is providing funding for a feasibility study and for the design of a final site remedy. Finally, long term remedial actions may be undertaken, including remedial construction, operation and maintenance, as required by site conditions. These response activities are authorized by Section 104(a)(1) of CERCLA.

CONCURRENCES

SYMBOL							
SURNAME	<i>mm</i>						
DATE	<i>1/20</i>						

Under Section 107 of CERCLA, certain responsible parties may be liable for money expended for response activities at the site, including investigation, planning, cleanup measures, and enforcement. Potentially liable parties include the current owners or operators of the site, past owners or operators, and persons who generated or transported the hazardous substances that were disposed of at the site.

Based on information which has been obtained during site cleanup activities, EPA believes that your company may be a responsible party with respect to this site and that your company may therefore be liable for public funds expended in response activities at the site. Before EPA undertakes further response activities, we desire to discuss with the appropriate official of your company voluntary involvement in the measures necessary to remedy the hazardous waste problems presently found at the site. In addition, we seek to discuss the recovery of those costs incurred by EPA in response activities to date and those costs projected to be incurred by EPA under the Cooperative Agreement discussed above.

If your company wishes to pursue a negotiated resolution of its liability under CERCLA or other laws with respect to this site, please so notify EPA, in writing, no later than February 7, 1983. Your letter should indicate the name, address, and telephone number of an appropriate company official for further contact on this matter. It should also include a statement of the type and the extent of the activities your company may be willing to undertake. Where your company is already involved in discussions with state or local authorities, or is engaged in voluntary action to clean up the site, these activities should be continued and their status should be reported in your letter. Your letter should be sent to:

Joel G. Blumstein
U.S. Environmental Protection Agency
Office of Regional Counsel
JFK Federal Building, Room 2203
Boston, MA 02203

If your response indicates your willingness to enter into meaningful negotiations, we will contact your company to schedule a meeting.

You should be aware that letters similar to this one have been sent this date to other parties who EPA believes may be responsible, offering to those parties a similar opportunity to enter negotiations with EPA. If you wish to obtain from EPA a list of those parties, you should submit a written request for that information to Mr. Blumstein.

If you need further information, you may contact Mr. Blumstein at (617) 223-5779. If your written response is not received by February 7, 1983, we will assume that your company has declined to participate in voluntary response activities or in any other negotiated resolution of this matter.

Sincerely yours,

Merrill S. Hohman, Director
Waste Management Division

cc: Regional Counsel, Region I
Director, Office of Emergency and Remedial Response
Director, Office of Waste Programs Enforcement
Office of Enforcement Counsel
Daniel J. Schatz, Rhode Island Department of Attorney General
Thomas Wright, Rhode Island Department of Environmental
Management
Allyn Myles Carnam, Olin Counsel - Regulatory Affairs
- New Haven, CT



120 LONG RIDGE ROAD, P.O. BOX 1355, STAMFORD, CT 06904-1355

February 1, 1983

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joel G. Blumstein
United States Environmental Protection Agency
Office of Regional Counsel
J.F.K. Federal Building, Room 2203
Boston, MA 02203

Re: Piccillo Waste Disposal
Coventry, Rhode Island

Dear Mr. Blumstein:

This is in reference to Mr. Merrill S. Hohman's January 20, 1983 letter to Mr. John Henske of the Olin Corporation and follows our telephone conversation of January 31 relative to the captioned matter.

As your records reflect, on August 13, 1982, I provided you, at your request, all the documents, data and information relating to Olin's chemical waste disposal in the State of Rhode Island. I believe a fair reading of the information we provided you would establish the following:

- (1) Olin did not ship, transfer or otherwise dispose of chemicals at the Piccillo Waste Disposal site.
- (2) The containers discovered at the Piccillo site, allegedly with the Olin label, were intact and did not evidence any leaking or otherwise indicate that the material therein had come in contact with the soil or ground water.
- (3) Olin only shipped a small number of containers to Rhode Island for disposal at the Capuano Brothers site in Cranston.

To date, we have not been provided any data or information, by the State of Rhode Island or the Environmental Protection Agency, to contradict any of the foregoing facts. Your position, as I understand it from our telephone conversation on January 31, is that the EPA is not at liberty to provide such data or information, although you did indicate to me that EPA did believe Olin is a "responsible party" within the meaning of Section 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

Olin, of course, as we have done with both the State of Rhode Island and your office, will continue to cooperate in providing any information and

*Rec'd
2/9/83
OKC*

respond to appropriate requests that you may make; however, it is very difficult to respond substantively to your January 20 letter unless you provide us with the specific basis on which EPA believes Olin is a responsible party in this matter. We assume that EPA believes it has been able to independently confirm the disposal of Olin chemicals at this site with data and/or information other than what we have provided you. If so, we are herein requesting such data and information.

Therefore, subject to the foregoing, we are herein formally expressing our willingness to discuss the above matters with you further and to that end, we would appreciate being advised of the date of any meetings between EPA, the State of Rhode Island and the parties your office believes to be responsible in this matter, as early as possible.

Finally, I am herein formally requesting from your office a list of all parties who EPA believes to be liable, under CERCLA, for money expended for response activities at the Piccillo site, including the investigation, planning, clean-up measures and enforcement, and the Cooperative Agreement between the State of Rhode Island and EPA.

Nothing contained herein should be construed as an admission by or binding on the Olin Corporation. The purpose of this letter is to formally respond to EPA's January 20 letter to Olin and to request additional data and information in order for us to further evaluate the Agency's contention that Olin generated chemicals, disposed of at the Piccillo site, which, in fact, will result in a release or threatend release of contaminants to the environment.

If you have any additional questions, please do not hesitate to contact me directly in New Haven (203-789-5330).

Sincerely,



Allyn Myles Carnam
Counsel - Regulatory Affairs

AMC/deh

cc: Merrill S. Hohman, Director
Waste Management Division
United States Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Dan Schatz, Esquire
Department of the Attorney General
72 Pine Street
Providence, Rhode Island



120 LONG RIDGE ROAD, P.O. BOX 1355, STAMFORD, CT 06904-1355

February 1, 1983

10910077

RECEIVED

FEB 19 1983

CERTIFIED MAIL - RETURN RECEIPT REQUESTED WASTE RESPONSE &
COMPLIANCE BRANCH

Mr. Joel G. Blumstein
United States Environmental Protection Agency
Office of Regional Counsel
J.F.K. Federal Building, Room 2203
Boston, MA 02203

Re: Piccillo Waste Disposal
Coventry, Rhode Island

RECEIVED

FEB 8 1983

REGION I
WASTE MGMT. DIVISION

Dear Mr. Blumstein:

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Olin, of course, as we have done with both the State of Rhode Island and your office, will continue to cooperate in providing any information and

O L I N C O R P O R A T I O N

respond to appropriate requests that you may make; however, it is very difficult to respond substantively to your January 20 letter unless you provide us with the specific basis on which EPA believes Olin is a responsible party in this matter. We assume that EPA believes it has been able to independently confirm the disposal of Olin chemicals at this site with data and/or information other than what we have provided you. If so, we are herein requesting such data and information.

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Nothing contained herein should be construed as an admission by or binding on the Olin Corporation. The purpose of this letter is to formally respond to EPA's January 20 letter to Olin and to request additional data and information in order for us to further evaluate the Agency's contention that Olin generated chemicals, disposed of at the Piccillo site, which, in fact, will result in a release or threatend release of contaminants to the environment.

If you have any additional questions, please do not hesitate to contact me directly in New Haven (203-789-5330).

Sincerely,



Allyn Myles Carnam
Counsel - Regulatory Affairs

AMC/deh

cc: Merrill S. Hohman, Director
Waste Management Division
United States Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Dan Schatz, Esquire
Department of the Attorney General
72 Pine Street
Providence, Rhode Island



120 LONG RIDGE ROAD, P.O. BOX 1388, STAMFORD, CT 06904-1388

February 1, 1983

RECEIVED

FEB 19 1983

CERTIFIED MAIL - RETURN RECEIPT REQUESTED WASTE RESPONSE & COMPLIANCE BRANCH

Mr. Joel G. Blumstein
United States Environmental Protection Agency
Office of Regional Counsel
J.F.K. Federal Building, Room 2203
Boston, MA 02203

Re: Piccillo Waste Disposal
Coventry, Rhode Island

RECEIVED

FEB 8 1983

REGION I
WASTE MGMT. DIVISION

Dear Mr. Blumstein:

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Olin, of course, as we have done with both the State of Rhode Island and your office, will continue to cooperate in providing any information and

10910080
respond to appropriate requests that you may make; however, it is very difficult to respond substantively to your January 20 letter unless you provide us with the specific basis on which EPA believes Olin is a responsible party in this matter. We assume that EPA believes it has been able to independently confirm the disposal of Olin chemicals at this site with data and/or information other than what we have provided you. If so, we are herein requesting such data and information.

Therefore, subject to the foregoing, we are herein formally expressing our willingness to discuss the above matters with you further and to that end, we would appreciate being advised of the date of any meetings between EPA, the State of Rhode Island and the parties your office believes to be responsible in this matter, as early as possible.

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Nothing contained herein should be construed as an admission by or binding on the Olin Corporation. The purpose of this letter is to formally respond to EPA's January 20 letter to Olin and to request additional data and information in order for us to further evaluate the Agency's contention that Olin generated chemicals, disposed of at the Piccillo site, which, in fact, will result in a release or threatend release of contaminants to the environment.

If you have any additional questions, please do not hesitate to contact me directly in New Haven (203-789-5330).

Sincerely,



Allyn Myles Carnam
Counsel - Regulatory Affairs

AMC/deh

cc: Merrill S. Hohman, Director
Waste Management Division
United States Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Dan Schatz, Esquire
Department of the Attorney General
72 Pine Street
Providence, Rhode Island

REPORT OF A PHONE CALL
VISIT

10910081

In _____ Out _____

File _____

Date 6/27 Time 11:30

Routing _____

Person Contacted Gary Benik

Phone No. 401-274-2000

Location _____

Subject Picik

Summary At PRP mtg we asked for July 1 letter, Greg will be sending such a letter tomorrow - would be willing to sit down & discuss. At this pt. all we would be willing to sit down & talk. No formal committee since pretty small grp. -

PRPs had some concern about incin. because of cost.

Benik made a request to EPA to release names of potential PRB in letter dated May 15, 1985 to Moebes & he has no response yet.

Action Required _____

Signature D. Martell

REPORT OF A PHONE CALL
VISIT

10910082

In _____ Out _____

File _____

Date 6/18 Time 3:30

Routing _____

Person Contacted Picillo - Greg Berik

Phone No. 401-

Location _____

Subject _____

Summary ① is generator mty. tomorrow ^{there is a} (if info to R/D, it ^{might} be valuable
for us. Even if no doc. if we can ~~get~~ give them an idea
as to remedy, I should call him back.

- I called ^{at 4:30} him to tell him that we haven't decided on a final remedy
yet, & are considering incin. as well as the options discussed in the R/FS.

Action Required _____

Signature Jim L. Marshall



RESEARCH CENTER, 275 SOUTH WINCHESTER AVENUE, P.O. BOX 30-275,
NEW HAVEN, CONNECTICUT 06511

(203) 789-5000

July 27, 1982

Joel Blumstein, Esquire
U. S. Environmental Protection Agency
Region I
J. F. Kennedy Federal Building
Boston, MA 02203

Re: Picillo Waste Disposal Site - Coventry,
Rhode Island; Request for Information

Dear Mr. Blumstein:

This confirms my attempt to reach you at your office on Tuesday, July 27, 1982, in response to Mr. Sutton's July 22 letter to Theodore Heying, Ph.D., of the Olin Corporation of New Haven, Connecticut, regarding the above-captioned matter. Your office advised me that you were on vacation for the balance of this week and since I will be on vacation until August 9, I do want an opportunity to discuss Mr. Sutton's letter with you before Olin submits a formal response.

As you may know, Olin has submitted data and information, similar to what you requested, to the State of Rhode Island through Mr. John P. Leo of the State Department of Environmental Management. A copy of this letter is enclosed herewith for your information and review. I also will plan to call you when I return from my vacation on August 9 to discuss Olin's formal response to EPA's July 22 letter.

Sincerely,


Allyn Myjes Carnam
Counsel-Regulatory Affairs

AMC/bl
Enclosure

cc: Daniel J. Schatz, Esquire
Special Assistant Attorney General

My Direct Dial Number:

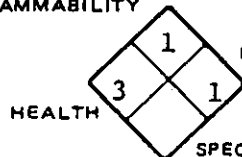
203-789-5330



EMERGENCY PHONE (203) 356-2345

Olin Corporation, 120 Long Ridge Road
Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

**MATERIAL
SAFETY DATA**

11120013

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS 2,4-Difluoronitrobenzene		
CHEMICAL FAMILY Fluoroaromatic	FORMULA $C_6H_3NO_2F_2$	TRADE NAME 2,4-DFNB
DESCRIPTION Yellow liquid	CAS NO. 70-34-8	

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin or on clothing. Do not take internally. Avoid breathing mist or vapor. Store in a cool, dry place away from oxidizing materials or flames.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
Eyes Goggles Gloves Required Other Coveralls and impervious boots	Local exhaust ventilation required where exposures to mist or vapors might occur.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS
2,4-difluoronitrobenzene	95%min				

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT METHOD	>200°F TOC	OSHA CLASSIFICATION Class IIIB Combustible liquid	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA	Water spray, dry chemical, foam, carbon dioxide. Cool fire-exposed containers with water.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES	Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	None established.
SYMPTOMS OF OVER EXPOSURE	Cyanosis, tremors and convulsions, irritation to eyes, skin and mucous membranes.
EMERGENCY FIRST-AID PROCEDURES	
SKIN	Wash with water for 15 minutes, call a physician.
EYES	Wash with water for 15 minutes, call a physician.
INGESTION	Drink water, induce vomiting by sticking finger down throat, call a physician.
INHALATION	Remove victim to fresh air, call a physician.

Chemical 2,4-Difluoronitrobenzene CAS No. 70-34-8

CHEMICAL NAME 2,4-Difluoronitrobenzene

11120014

SECTION VI - TOXICOLOGY (Product)

ACUTE ORAL LD 50	273 mg/kg (mice)	CARCINOGENIC	Not known to be carcinogenic
		MUTAGENIC	Positive Ames test
ACUTE DERMAL LD 50	~375 mg/kg (rabbit)	EYE IRRITATION	Irritant
		PRIMARY SKIN IRRITATION	Irritant
ACUTE INHALATION LC 50	> 1.29 mg/liter of inspired air for 1 hr. (this value represents the maximum attainable concentration).		
PRINCIPAL ROUTES OF ABSORPTION	Oral, dermal.		
EFFECTS OF ACUTE EXPOSURE	Cyanosis, tremors, convulsions, irritation to eyes, skin and mucous membranes.		
EFFECTS OF CHRONIC EXPOSURE	Not known.		

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear NIOSH/MSHA approved self-contained breathing apparatus. Follow OSHA regulations for respirator use. (See 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add non-combustible dry absorbent, shovel or sweep up and place in an approved DOT container and seal. Flush any residual material with water. Wash all contaminated clothing before reuse.

In the event of a massive spill, use the emergency phone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of clean up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/>	UNSTABLE	AT <u>boiling pt.</u> °F	HAZARDOUS POLYMERIZATION	MAY OCCUR
CONDITIONS TO AVOID				WILL NOT OCCUR <input checked="" type="checkbox"/>
INCOMPATIBILITY (Material To Avoid)		Oxidizing materials.		
HAZARDOUS DECOMPOSITION PRODUCTS		Hydrogen fluoride and nitrogen oxides at 240°C		

SECTION IX - PHYSICAL DATA

MELTING POINT	9.75°C	VAPOR PRESSURE	VOLATILES
BOILING POINT	404°F	SOLUBILITY IN WATER	insoluble
SPECIFIC GRAVITY (H ₂ O = 1)	1.442	pH	EVAPORATION RATE
	@ 25°C		VAPOR DENSITY (Air = 1)

INFORMATION FURNISHED BY: C. J. Michaels DATE 7/29/80

Department of Environmental Hygiene and Toxicology



CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

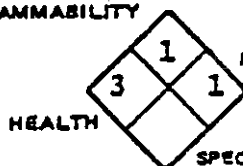
EMERGENCY PHONE (203) 356-2345



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Olin Corporation, 120 Long Ridge Road
Stamford, Conn. 06904

FLAMMABILITY



MATERIAL SAFETY DATA

11120015

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS Toluene Diisocyanate 80-20		
CHEMICAL FAMILY Isocyanate	FORMULA $C_9H_6N_2O_2$	TRADE NAME TDI-80-20
DESCRIPTION Clear water white to pale yellow liquid with sharp pungent odor.	CAS NO. 26471-62-5	

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin, or on clothing. Do not take internally. Avoid breathing mist or vapor. STORAGE: Protect against physical damage. Store in a cool, dry, well-ventilated location, away from areas where the fire hazard may be acute. Outside or detached storage is preferred. If stored in tanks it should be blanketed with an inert gas such as nitrogen or with dry air. Separate from oxidizing materials.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT Eyes Goggles Gloves Rubber, NBR or PVA. Other Coveralls, impervious footwear.	VENTILATION REQUIREMENTS As required to keep airborne concentrations below TLV.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 270°F METHOD	OSHA CLASSIFICATION Class III Combustible liquid	FLAMMABLE/EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water, carbon dioxide or dry chemical. Use water to keep the exposed containers cool.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 0.02 ppm	
SYMPTOMS OF OVER EXPOSURE Skin, eye and mucous membrane irritant. May cause burns and irritation to lungs, labored breathing. Allergic sensitization to skin and respiratory tract.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	Flush thoroughly with water for 15 minutes. Call a physician.
EYES	Flush thoroughly with water for 15 minutes, Call a physician.
INGESTION	Do not induce vomiting, give plenty of water to drink. Call a physician.
INHALATION	Remove victim to fresh air. Notify physician of exposure. If breathing is labored, see a physician.

Chemical

TDI 80-20

CAS No.

26471-62-5

CHEMICAL NAME Toluene Diisocyanate 80-20

11120016

SECTION VI - TOXICOLOGY (Product)

ACUTE ORAL LD 50	5.8g/kg (rats)	CARCINOGENIC	Not known to be carcinogenic
		MUTAGENIC	Not known to be mutagenic
ACUTE DERMAL LD 50	> 2g/kg (rabbits)	EYE IRRITATION	Irritation and/or burns.
		PRIMARY SKIN IRRITATION	Irritation and/or burns
ACUTE INHALATION LC 50	> a nominal concentration of 2 mg/liter of inspired air for 1 hour.		

PRINCIPAL ROUTES OF ABSORPTION

Inhalation, oral.

EFFECTS OF ACUTE EXPOSURE Skin, eye & mucous membrane irritant. May cause burns to GI tract, irritation to lungs, labored breathing. Allergic sensitization of skin & resp. tract.

EFFECTS OF CHRONIC EXPOSURE Damage to lungs, allergic sensitization. Pre-employment physical should exclude persons with recurring pulmonary disease and/or allergic history.

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear NIOSH/MSHA approved self-contained breathing apparatus, or air supplied respirator. Follow OSHA regulations for respirator use. (See 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add dry absorbent, sweep up material and place in an approved DOT container and seal. Keep container cool. Clean any remaining material with a neutralizing solution, 10% Isopropyl Alcohol, 85% Water, 5% Ammonia. Wash all contaminated clothing before reuse.

In the event of a massive spill, use the emergency phone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of clean-up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate Federal, State and Local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/> UNSTABLE <input type="checkbox"/>	AT _____ °C _____ °F	HAZARDOUS POLYMERIZATION	MAY OCCUR <input checked="" type="checkbox"/> WILL NOT OCCUR <input type="checkbox"/>
--	----------------------	--------------------------	--

CONDITIONS TO AVOID Water or incompatible materials in a closed system.

INCOMPATIBILITY (Material To Avoid) Acids, bases and alcohols.

HAZARDOUS DECOMPOSITION PRODUCTS Carbon monoxide, nitrogen oxides, traces of cyanide.

SECTION IX - PHYSICAL DATA

MELTING POINT 53-56°F	VAPOR PRESSURE 0.01	VOLATILES
BOILING POINT 484°F	SOLUBILITY IN WATER	EVAPORATION RATE
SPECIFIC GRAVITY (H ₂ O = 1) 1.22	pH	VAPOR DENSITY (Air = 1)

INFORMATION FURNISHED BY: C. J. Michaels

DATE 4/1/80 (Rev. 6/18/80)

Department of Environmental Hygiene and Toxicology



CORPORATION

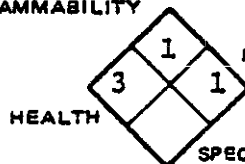
120 Long Ridge Road, Stamford, Connecticut 06904

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EMERGENCY PHONE (203) 356-2345
Olin Corporation, 120 Long Ridge Road
Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

MATERIAL SAFETY DATA

11120017

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS Toluene Diisocyanate 80-20		
CHEMICAL FAMILY Isocyanate	FORMULA $C_9H_6N_2O_2$	TRADE NAME TDI-80-20
DESCRIPTION Clear water white to pale yellow liquid with sharp pungent odor.	CAS NO. 26471-62-5	

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin, or on clothing. Do not take internally. Avoid breathing mist or vapor. STORAGE: Protect against physical damage. Store in a cool, dry, well-ventilated location, away from areas where the fire hazard may be acute. Outside or detached storage is preferred. If stored in tanks it should be blanketed with an inert gas such as nitrogen or with dry air. Separate from oxidizing materials.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT Eyes Goggles Gloves Rubber, NBR or PVA. Other Coveralls, impervious footwear.	VENTILATION REQUIREMENTS As required to keep airborne concentrations below TLV.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH-POINT METHOD 270°F	OSHA CLASSIFICATION Class IIIB Combustible liquid	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water, carbon dioxide or dry chemical. Use water to keep the exposed containers cool.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 0.02 ppm	
SYMPTOMS OF OVER EXPOSURE Skin, eye and mucous membrane irritant. May cause burns and irritation to lungs, labored breathing. Allergic sensitization to skin and respiratory tract.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	Flush thoroughly with water for 15 minutes. Call a physician.
EYES	Flush thoroughly with water for 15 minutes, Call a physician.
INGESTION	Do not induce vomiting, give plenty of water to drink. Call a physician.
INHALATION	Remove victim to fresh air. Notify physician of exposure. If breathing is labored, see a physician.

Chemical TDI 80-20

CAS No. 26471-62-5

CHEMICAL NAME Toluene Diisocyanate 80-20

11120018

SECTION VI - TOXICOLOGY (Product)

ACUTE ORAL LD 50	5.8g/kg (rats)	CARCINOGENIC	Not known to be carcinogenic
ACUTE DERMAL LD 50	> 2g/kg (rabbits)	MUTAGENIC	Not known to be mutagenic
ACUTE INHALATION LC 50	> a nominal concentration of 2 mg/liter of inspired air for 1 hour.	EYE IRRITATION	Irritation and/or burns.
PRINCIPAL ROUTES OF ABSORPTION		PRIMARY SKIN IRRITATION	Irritation and/or burns
Inhalation, oral.			
EFFECTS OF ACUTE EXPOSURE Skin, eye & mucous membrane irritant. May cause burns to GI tract, irritation to lungs, labored breathing. Allergic sensitization of skin & resp. tract.			
EFFECTS OF CHRONIC EXPOSURE Damage to lungs, allergic sensitization. Pre-employment physical should exclude persons with recurring pulmonary disease and/or allergic history.			

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear NIOSH/MSHA approved self-contained breathing apparatus, or air supplied respirator. Follow OSHA regulations for respirator use. (See 29 CFR 1910.134). Wear goggles, coveralls and impervious gloves and boots. Add dry absorbent, sweep up material and place in an approved DOT container and seal. Keep container cool. Clean any remaining material with a neutralizing solution, 10% Isopropyl Alcohol, 85% Water, 5% Ammonia. Wash all contaminated clothing before reuse.

In the event of a massive spill, use the emergency phone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of clean-up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate Federal, State and Local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/>	UNSTABLE	AT _____°C _____°F	HAZARDOUS POLYMERIZATION	MAY OCCUR <input checked="" type="checkbox"/>
				WILL NOT OCCUR
CONDITIONS TO AVOID Water or incompatible materials in a closed system.				
INCOMPATABILITY (Material To Avoid) Acids, bases and alcohols.				
HAZARDOUS DECOMPOSITION PRODUCTS Carbon monoxide, nitrogen oxides, traces of cyanide.				

SECTION IX - PHYSICAL DATA

MELTING POINT	53-56°F	VAPOR PRESSURE	0.01	VOLATILES
BOILING POINT	484°F	SOLUBILITY IN WATER		EVAPORATION RATE
SPECIFIC GRAVITY (H ₂ O = 1)	1.22	pH		VAPOR DENSITY (Air = 1)

INFORMATION FURNISHED BY: C. J. Michaels

DATE 4/1/80 (Rev. 6/18/80)

Department of Environmental Hygiene and Toxicology



CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

EMERGENCY PHONE (203) 356-2345

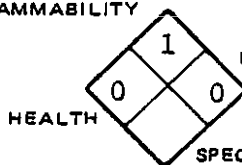


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Olin Corporation; 120 Long Ridge Road

Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

MATERIAL
SAFETY DATA

11120019

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS POLY-G [®] 32-56		
CHEMICAL FAMILY Polyether Triol	FORMULA	TRADE NAME POLY-G [®] 32-56
DESCRIPTION Liquid		CAS NO.

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin, or on clothing. Do not take internally. Avoid breathing mist or vapors. Upon contact with skin or eyes, wash off with water.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT Eyes None required Gloves None required Other None required	VENTILATION REQUIREMENTS None beyond normal good room ventilation.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT METHOD 475°F COC	OSHA CLASSIFICATION Class IIIB Combustible liquid	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water spray, dry chemical, alcohol foam, carbon dioxide.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE None established.	
SYMPTOMS OF OVER EXPOSURE Diarrhea.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	None necessary.
EYES	None necessary.
INGESTION	None necessary.
INHALATION	None necessary.

Chemical POLY-G[®] 32-56

CAS No.

CHEMICAL NAME POLY-G[®] 32-56

11120020

SECTION VI - TOXICOLOGY (Product)

ACUTE ORAL LD 50 > 14 g/kg (rat)	CARCINOGENIC Not known to be carcinogenic
ACUTE DERMAL LD 50 > 2 g/kg (rabbit)	MUTAGENIC Not known to be mutagenic
ACUTE INHALATION LC 50 > a nominal concentration of 200 mg/l of inspired air for 1 hour.	EYE IRRITATION Not an irritant
	PRIMARY SKIN IRRITATION Not an irritant
PRINCIPAL ROUTES OF ABSORPTION	
Oral.	
EFFECTS OF ACUTE EXPOSURE	
Diarrhea.	
EFFECTS OF CHRONIC EXPOSURE	
None expected at industrial use levels.	

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Wear goggles, coveralls and impervious gloves and boots. Add dry absorbent and shovel or sweep up and place in an approved DOT container and seal. Flush any remaining material with water. Wash any contaminated clothing before reuse. In the event of a massive spill, use the emergency phone number shown on the front of this sheet.
WASTE DISPOSAL METHOD Dispose of clean-up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate Federal, State and Local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/> UNSTABLE <input type="checkbox"/> AT _____ °C _____ °F	HAZARDOUS POLYMERIZATION	MAY OCCUR WILL NOT OCCUR <input checked="" type="checkbox"/>
CONDITIONS TO AVOID		
INCOMPATIBILITY (Material To Avoid)		
HAZARDOUS DECOMPOSITION PRODUCTS		

SECTION IX - PHYSICAL DATA

MELTING POINT	VAPOR PRESSURE	VOLATILES
BOILING POINT	SOLUBILITY IN WATER Slightly	EVAPORATION RATE
SPECIFIC GRAVITY (H ₂ O = 1) 1.013 @ 25°C	pH 7.2	VAPOR DENSITY (Air = 1)

INFORMATION FURNISHED BY: C. J. Michaels

DATE 9/25/79

Department of Environmental Hygiene and Toxicology



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120 Long Ridge Road, Stamford, Connecticut 06904

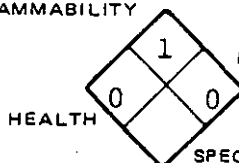
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Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HAZARD RATING

SPECIAL

MATERIAL SAFETY DATA

11120021

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS POLY-G [®] 71-350		
CHEMICAL FAMILY Polyether Polyol	FORMULA	TRADE NAME POLY-G [®] 71-350
DESCRIPTION Clear amber liquid.		CAS NO.

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin, or on clothing. Do not take internally. Upon contact with skin or eyes, wash off with water. Avoid breathing mist or vapor.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT Eyes None required Gloves None required Other None required	VENTILATION REQUIREMENTS None beyond normal good room ventilation.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT METHOD 418°F COC	OSHA CLASSIFICATION Class IIIB Combustible liquid.	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water spray, dry chemical, carbon dioxide, alcohol foam.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE None established.	
SYMPTOMS OF OVER EXPOSURE Practically non-toxic.	
SKIN	None necessary.
EYES	None necessary.
INGESTION	None necessary.
INHALATION	None necessary.

Chemical

POLY-G[®] 71-350

CAS No.

CHEMICAL NAME, POLY-G[®] 71-350

SECTION VI - TOXICOLOGY (Product)

11120022

ACUTE ORAL LD 50 14.5 g/kg (rats)	CARCINOGENIC Not known to be carcinogenic
ACUTE DERMAL LD 50 > 2 g/kg (rabbits)	MUTAGENIC Not known to be mutagenic
ACUTE INHALATION LC 50 > a nominal concentration of 200 mg/l of inspired air for 1 hour (rats)	EYE IRRITATION Not an irritant
	PRIMARY SKIN IRRITATION Not an irritant
PRINCIPAL ROUTES OF ABSORPTION Oral	
EFFECTS OF ACUTE EXPOSURE Practically non-toxic.	
EFFECTS OF CHRONIC EXPOSURE None at industrial use levels.	

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
Wear goggles, coveralls and impervious gloves and boots. Add dry absorbent and shovel or sweep up and place in an approved DOT container and seal. Flush any remaining material with water. Wash all contaminated clothing before reuse.
In the event of a massive spill, use the emergency phone number shown on the front of this sheet.
WASTE DISPOSAL METHOD
Dispose of clean up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE <input checked="" type="checkbox"/> UNSTABLE <input type="checkbox"/> AT _____ °C _____ °F	HAZARDOUS POLYMERIZATION	MAY OCCUR
CONDITIONS TO AVOID		WILL NOT OCCUR
INCOMPATIBILITY (Material To Avoid)		
HAZARDOUS DECOMPOSITION PRODUCTS		

SECTION IX - PHYSICAL DATA

MELTING POINT	VAPOR PRESSURE	VOLATILES
BOILING POINT	SOLUBILITY IN WATER soluble	EVAPORATION RATE
SPECIFIC GRAVITY(H ₂ O = 1) 1.10	pH in 10/6 Isopropanol/water	VAPOR DENSITY(Air = 1)
	= 8.5-10.5	

INFORMATION FURNISHED BY: C. J. Michaels

DATE 7/29/80

Department of Environmental Hygiene and Toxicology



CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904

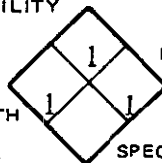
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FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

MATERIAL SAFETY DATA

11120023

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS Thermolin ^R RF-230 + Fluorocarbon 11		
CHEMICAL FAMILY Polyol	FORMULA	TRADE NAME Thermolin ^R RF-230 (93%)
DESCRIPTION Dark colored viscous liquid		CAS NO.

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin or on clothing. Do not take internally. Avoid breathing mist or vapor. Upon contact with skin, wash off with water. Store in a cool, dry place.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT	VENTILATION REQUIREMENTS
Eyes Goggles Gloves None required Other None required	Local exhaust or general ventilation required as dictated by airborne concentrations and sufficient to keep concentrations of Fluorocarbon below OSHA PEL.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS
Freon 11	7	1000 ppm			
Chlorinated polyether polyol					

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT 320°F METHOD after R11 removal	OSHA CLASSIFICATION Class IIIB Combustible Liquid	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Water spray, dry chemical, foam or carbon dioxide.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE None established.	
SYMPTOMS OF OVER EXPOSURE May cause eye and mucous membrane irritation.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	None necessary.
EYES	Flush with water for 15 minutes, call a physician.
INGESTION	None necessary
INHALATION	Remove victim to fresh air, call a physician.

Chemical Thermolin^R RF-230 (93%)

CAS No.

CHEMICAL NAME Thermolin^R RF-230 (93%)

SECTION VI - TOXICOLOGY (Product)

11120024

ACUTE ORAL LD 50	6.9 g/kg (rat)	CARCINOGENIC	Not known to be carcinogenic
ACUTE DERMAL LD 50	Greater than 2 g/kg (rabbit)	MUTAGENIC	Negative Ames and dominant lethal mutagen tests
ACUTE INHALATION LC 50	Greater than a nominal concentration of 200 mg/l of inspired air for 1 hour (rat)	EYE IRRITATION	Irritant
		PRIMARY SKIN IRRITATION	Not an Irritant
PRINCIPAL ROUTES OF ABSORPTION			
Oral			
EFFECTS OF ACUTE EXPOSURE			
May cause eye and mucous membrane irritation			
EFFECTS OF CHRONIC EXPOSURE			
Liver and kidney damage, hyperthyroidism, minor skeletal abnormality in fetuses at levels higher than expected in industry.			

SECTION VII - SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wear goggles, coveralls, impervious gloves and boots. Add dry absorbent, shovel or sweep up. Place in an approved DOT container and seal. Wash all contaminated clothing before reuse.

In the event of a large spill use the emergency telephone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of contaminated product and materials used in cleaning up spills or leaks in a manner approved for this material. Consult appropriate federal, state and local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII - REACTIVITY DATA

STABLE	UNSTABLE	X AT <u>90</u> °C <u> </u> °F	HAZARDOUS POLYMERIZATION	MAY OCCUR
				WILL NOT OCCUR X
CONDITIONS TO AVOID				
Temperatures above 50°C				
INCOMPATIBILITY (Material To Avoid)				
HAZARDOUS DECOMPOSITION PRODUCTS				

SECTION IX - PHYSICAL DATA

MELTING POINT	VAPOR PRESSURE <u>1700 mm/Hg@50°C</u>	VOLATILITIES	<u>7</u>
BOILING POINT	SOLUBILITY IN WATER <u>insoluble</u>	EVAPORATION RATE	
SPECIFIC GRAVITY (H ₂ O = 1) <u>1.5</u>	pH	VAPOR DENSITY (Air = 1)	

INFORMATION FURNISHED BY: C. J. Michaels DATE July 29, 1980
Department of Environmental Hygiene and Toxicology (Revision #2 May 27, 1981)



olin CORPORATION

120 Long Ridge Road, Stamford, Connecticut 06904-1269

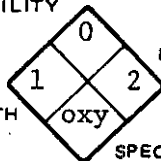
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EMERGENCY PHONE (203) 356-2345

Olin Corporation, 120 Long Ridge Road
Stamford, Conn. 06904

FLAMMABILITY



REACTIVITY

HEALTH

HAZARD RATING

SPECIAL

MATERIAL SAFETY DATA

11120025

SECTION I - IDENTIFICATION

CHEMICAL NAME & SYNONYMS Calcium Hypochlorite 70%		
CHEMICAL FAMILY Hypochlorite	FORMULA $\text{Ca}(\text{OCl})_2$	TRADE NAME OLIN Calcium Hypochlorite Granular
DESCRIPTION White free flowing granular solid with chlorinous odor.		CAS NO. 7778-54-3

SECTION II - NORMAL HANDLING PROCEDURES

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE Do not get in eyes, on skin, or on clothing. Avoid breathing dust. Do not take internally. Protect against physical damage. Store in cool dry, well-ventilated place from combustible materials. Drums may rupture if exposed to heat.	
CORROSIVE ACTION ON MATERIALS (Metals, Plastic, Rubber, Etc.)	
PROTECTIVE EQUIPMENT Eyes Goggles Gloves Rubber, neoprene or PVC Other Coveralls and boots	VENTILATION REQUIREMENTS Local exhaust ventilation required where exposure to dust might occur.

SECTION III - HAZARDOUS INGREDIENTS

BASIC MATERIAL	APPROX. %	OSHA PEL	LD 50	LC 50	SIGNIFICANT EFFECTS

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT METHOD Not applicable	OSHA CLASSIFICATION Class 3 oxidizer	FLAMMABLE EXPLOSIVE LIMITS	LOWER	UPPER
EXTINGUISHING MEDIA Not combustible but may ignite combustible materials or organic matter upon contact. Flood with water to keep fire-exposed containers cool.				
SPECIAL FIRE HAZARD & FIRE FIGHTING PROCEDURES Use NIOSH/MSHA approved self-contained breathing apparatus where this material is involved in a fire. Fires can erupt and spread rapidly.				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE None established.	
SYMPTOMS OF OVER EXPOSURE Corrosion of all tissue contacted.	
EMERGENCY FIRST-AID PROCEDURES	
SKIN	Flush with water for 15 minutes, call a physician.
EYES	Flush with water for 15 minutes, call a physician.
INGESTION	Give large amounts of water to drink. Do not induce vomiting. Call a physician.
INHALATION	Remove victim to fresh air, call a physician.

Chemical
Granular
OLIN Calcium Hypochlorite

CAS No. 7778-54-3

OLIN Calcium Hypochlorite
CHEMICAL NAME Granular

11120026

SECTION VI – TOXICOLOGY (Product)

ACUTE ORAL LD 50 850 mg/kg (rat)	CARCINOGENIC Not known to be carcinogenic
ACUTE DERMAL LD 50 > 2g/kg (rabbit)	MUTAGENIC Negative dominant lethal mutagen test
ACUTE INHALATION LC 50 < 20 mg/liter and > 2 mg/liter of inspired air for 1 hour (rat)	EYE IRRITATION Corrosive
	PRIMARY SKIN IRRITATION Corrosive
PRINCIPAL ROUTES OF ABSORPTION Oral.	
EFFECTS OF ACUTE EXPOSURE Corrosion of all tissues contacted.	
EFFECTS OF CHRONIC EXPOSURE None known other than those secondary to acute effects.	

SECTION VII – SPILL OR LEAKAGE PROCEDURES (Control Procedures)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Remove all sources of ignition. Wear NIOSH/MSHA respirator approved for dust and chlorine. Follow OSHA regulations for respirator use. (See 29 CFR 1910.134). Wear goggles, coveralls and rubber, neoprene or PVC gloves and boots. Clean up in a manner to minimize contamination with organic material. Do not return material to original container. Place in a fresh container and isolate outside or in a well ventilated area. Do not seal the container. Flush any residual material with large quantities of water. In the event of a large spill use the emergency telephone number shown on the front of this sheet.

WASTE DISPOSAL METHOD

Dispose of clean up debris, contaminated material and residues, in a manner approved for this material. Consult appropriate Federal, State and Local regulatory agencies to ascertain proper disposal procedures.

SECTION VIII – REACTIVITY DATA

STABLE	UNSTABLE X AT _____ °C 350 °F	HAZARDOUS POLYMERIZATION	MAY OCCUR WILL NOT OCCUR X
CONDITIONS TO AVOID When heated to 350°F it decomposes rapidly with evolution of oxygen and heat.			
INCOMPATIBILITY (Material To Avoid) Solvents, acids, pool chemicals, (isocyanurates), vinegar, organic materials. Do not mix with anything but water.			
HAZARDOUS DECOMPOSITION PRODUCTS Chlorine.			

SECTION IX – PHYSICAL DATA

MELTING POINT 177°C	VAPOR PRESSURE	VOLATILES
BOILING POINT	SOLUBILITY IN WATER 21% @ 21°C	EVAPORATION RATE
SPECIFIC GRAVITY (H ₂ O = 1)	pH 1% aq soln 10.5-11.5	VAPOR DENSITY (Air = 1)
Density, Loose 47-50 lbs/cu.ft		

INFORMATION FURNISHED BY: C. J. Michaels DATE 7/22/80

Department of Environmental Hygiene and Toxicology



olin CORPORATION

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